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Montana Department of Transportation
Environmental Baseline Assessment
Final Report

April 27, 1993

Prepared by:

MSE, Inc.
Technical Services Division

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Montana Department of Transportation Environmental Baseline Assessment Report

EXECUTIVE SUMMARY

The Technical Services Division of MSE, Inc., is pleased to submit this Environmental Baseline Assessment Report to the Montana Department of Transportation (MDT). As shown in Figure 1, preparation of this report completes the first phase of MSE's three phase contract with MDT. The data presented is based upon information collected by MDT's auditors during their environmental assessments and information gathered by MSE through follow-up audits. The purpose of the report is to:

- Identify the hazardous materials that are used and the wastes that are generated from various maintenance activities
- Form a picture of the environmental compliance status at MDT facilities based upon information gathered by MDT and MSE auditors
- Identify special environmental issues not included in the contract but related to the subjects addressed or contemporary issues related to environmental compliance
- Identify institutional issues that may be root causes of some the conditions observed.

It is not the purpose of this report to provide solutions or recommendations for further action, but rather, to document findings and observations from the audits that were conducted. The baseline assessment is principally a cataloging effort. As shown in Figure 1, solutions and recommendations will be provided in phase two and three of the contract. Under phase two, corrective action plans will be prepared to address the findings identified in this report. Under phase three, a Hazardous Materials and Waste Management Plan will be prepared which will provide detailed, day-to-day operating procedures to assist MDT employees in complying with environmental regulations.

In July, 1992, MSE developed a two-volume *MDT*

Contract Phase	Associated Tasks	Purpose
Baseline Assessment	MSE develops audit training manuals MSE conducts audit training MDT conducts audits MSE verifies MDT audits MSE prepares Environmental Baseline Assessment Report	Document environmental baseline conditions at MDT facilities throughout the State
Corrective Action Planning	MSE develops corrective action plans (CAPs) MSE conducts CAP training MDT and Contractor implement CAPs MSE verifies CAP implementation	Address the findings identified in the Environmental Baseline Assessment Report
Environmental Management	MSE develops Hazardous Materials Management Plan for MDT implementation	Develop detailed procedures to ensure proper management of hazardous materials and wastes and to minimize future liabilities

Figure 1. The information obtained from the audit process will assist MDT in implementing corrective actions and the Hazardous Materials and Waste Management Plan.

Environmental Compliance Audit Training Manual. MSE then provided three days of training to approximately 40 MDT employees on how to conduct environmental compliance audits and assessments. After the training, these personnel began conducting site assessments and gathering information to complete the "MDT Abbreviated Environmental Audit Checklist" (Appendix A). MDT employees have conducted 263 assessments at facilities in all five districts throughout the State. Facilities assessed include maintenance shops, section sites, airports, laboratories, rest areas, stockpile sites, and GVW stations. In general, MSE has found MDT's initial assessments to be accurate and thorough. MDT's auditors evaluated facility compliance with respect to the following five environmental statutes:

- Resource Conservation and Recovery Act (RCRA) which governs management of solid and hazardous wastes
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), a federal act, and the Comprehensive Environmental Cleanup and Responsibility Act (CECRA), a state act, addressing uncontrolled releases of hazardous substances to the environment
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) regarding management of pesticides
- Toxic Substances Control Act (TSCA) which provides management requirements for PCBs.

While there are other environmental statutes and regulations that may be applicable to MDT's activities, it was beyond the scope of this project to include them in any substantial way in the audit process. Several specific issues are discussed briefly in this report because they are examples of sources of potential environmental liability. These include management of treated timber wastes, used oil, stormwater runoff, land management, and right-of-ways.

In December 1992, MSE conducted verification audits of 17 facilities. The purpose of these audits was to:

- Verify the information provided by MDT in the initial assessment reports
- Assess environmental compliance in more detail using detailed audit checklists
- Obtain a better understanding of work practices and procedures so that the reasons for non-compliance with environmental regulations can be understood
- Identify noteworthy practices that might benefit other MDT facilities.

As a result of the assessments and audits conducted by MDT and MSE, the Department will have a better understanding of the processes that use hazardous materials and generate hazardous waste and the liabilities associated with materials and waste management. Table 1 summarizes the hazardous materials that are used in MDT operations as identified in this process and the wastes that are generated. The table uses two terms in an attempt to categorize and prioritize the materials. These terms are *recyclable* and *liability*: *Recyclable* refers to any waste that can be potentially burned for energy recovery, stored for reuse, provided to another user, or recycled in the traditional sense; *Liability* refers to the cost incurred by MDT for proper management and disposal of waste, or the cleanup costs and potential third-party liabilities when wastes migrate offsite and impact adjacent property. As shown in the table, management of waste paints, solvents, pesticides, and used oil present the greatest quantifiable liability to MDT.

In general, MSE has found that most MDT employees are personally motivated and interested in understanding and complying with environmental regulations. Several MDT employees have shown great initiative in minimizing the quantity and toxicity of waste that is generated on a day-to-day basis. However, the majority of employees MSE spoke with indicated that they do not receive needed direction and training from within the Department on how to properly manage hazardous materials and wastes. As a result, MDT is in non-compliance with the majority of the regulatory requirements investigated at the facilities. This presents a significant enforcement liability to the Department, particularly with respect to RCRA and CERCLA. For instance, mismanagement of hazardous wastes under RCRA can result in civil penalties up to $25,000/day, and criminal penalties associated with knowing misconduct can result in fines of up to $250,000 and imprisonment. While these penalties certainly represent the worst-case situation, they illustrate the gravity with which the MDT must consider these issues. The case record across the nation is replete with examples of stiff enforcement actions against public agencies, responsible civil servants, and public officials. Following is a summary of the findings contained in this report.

RCRA

- Waste minimization, pollution prevention, source

Table 1. MDT maintenance activities generate both solid and hazardous wastes. Most wastes are generated in small quantities, so the greatest liability lies with paints, solvents, pesticides, and used oils.

Maintenance Activity	Hazardous Materials Used	Waste Generated	Waste Type	Potentially Recyclable	Potential Liability
Roadway Repair	Road Oil Asphalt Tack Rejuvenator	Excess Quantities of These Materials	Solid	Yes	Low, except for road oil, which is medium due to quantity used and waste generated.
Striping	Yellow Paint White Paint	Solvents	Unused/Waste Paints and Solvents	Yes	High, since large quantities are used and waste is likely hazardous.
Winter Roadway Maintenance	Salt Mg Chloride	Snow Melt or Runoff	Solid	No	Low, unless large quantities are spilled and migrate toward surface waters.
Roadside Maintenance	Pesticides	Unused/Outdated Pesticides or Empty Container	Hazardous*	No	High, due to relatively high toxicity.
Equipment and Vehicles	Oils & Grease Solvents Spray Paints Batteries Cleaners Vehicle Fluids	Used Oil Used Filters Spent Solvents Unused Products Used Batteries Empty Containers	Solid and Hazardous	Yes	Medium, since most waste is generated in small quantities, but is often hazardous and discharged through floor drains.
Facilities	Paints Thinners Primers Floor Adhesives Deliming Agents	Unused Products Empty Container	Solid and Hazardous	Yes	Low, since most waste is generated in small quantities.
Laboratories and Support Facilities	Solvents Lab Chemicals Reagents Mercury Inks/Paints Thinners Stop Bath Fixer Developer Toner	Unused Products Spent/Off-Spec Solutions Mercury Bricks Spent Fixer	Solid and Hazardous	Yes	Low, since most waste is generated in small quantities and assuming excess stock is not accumulated.
Airports	Paints Cleaners Solvents Oils	Unused Products Spent Solvents Used Oils Empty Containers	Solid and Hazardous	Yes	Low, since most waste is generated in small quantities.
GVW Stations	Solvents Cleaners Paints	Spent Solvents Empty Container Unused Products	Solid and Hazardous	Yes	Low, since most waste is generated in small quantities.

*If pesticide containers are emptied and properly rinsed, a hazardous waste is not generated.

reduction, and recycling is not given the priority required under RCRA and the Pollution Prevention Act of 1990.

- At least 46,000 gallons of waste will need to be disposed of by the Department. This is a significant liability to MDT since disposal costs alone may well exceed $500,000 (Table 2).

- The majority of underground storage tank (UST) systems that are active or inactive lack necessary leak detection.

- Most of MDT's facilities could be considered "conditionally exempt small quantity generators" since they generate less than 220 lbs (half of a 55-gallon drum) of waste in a given month and never accumulate more than 2,200 lbs (about 5 drums) at any given time. Fewer waste management requirements apply to generators with this status.

- The majority of MDT facilities are not complying with the RCRA requirements for management of hazardous wastes. The requirements that are not being met include:
  - Determining if a generated waste is a hazardous waste
  - Proper storage of hazardous waste in containers
  - Disposal of hazardous wastes only at authorized facilities and within allowable time frames
  - Recordkeeping and reporting.

CERCLA/CECRA

- MDT has identified over 300 separate sites that are potentially releasing hazardous substances to the environment. These sites represent a potential multimillion-dollar liability to the MDT.

- Many MDT facilities use sumps (which drain to dry wells and septic systems) and onsite dumping as a method of disposing of hazardous substances and wastes. This practice has the potential to significantly impact soils, groundwater, nearby surface waters, and in some cases, adjacent, non-MDT property (Figure 2).

- Approximately half of the sites audited were not familiar with the requirements for reporting releases of hazardous substances or the requirements for notifying local authorities of the hazardous substances present at the facility.

FIFRA

- Several sites have expired pesticides which require proper disposal (Figure 3).

- Pesticides are not stored and disposed of in accordance with EPA recommendations or label directions, inventories of pesticides are not maintained, and local authorities have not been notified of the pesticides present at facilities.

TSCA

- Many transformers and several generators that may contain PCBs are present on MDT property, the majority of which are owned by

Table 2. The cost to properly dispose of 46,000 gallons of waste is estimated at $500,000.

Waste Type	District 1	District 2	District 3	District 4	District 5	**Total Gallons**
Paint	1,062	12,612	2,102	1,331	957	**18,064**
Solvent	0	220	990	165	165	**1,540**
Unknown	2,277	4,125	3	127	495	**7,027**
Oil	6,875	3,795	2,750	655	1,320	**15,395**
Pesticide	0	0	0	0	55	**55**
Herbicide	35	0	16	0	0	**51**
Miscellaneous	660	350	453	2,585	165	**4,213**
Total Gallons	**10,909**	**21,102**	**6,314**	**4,863**	**3,157**	**46,345**

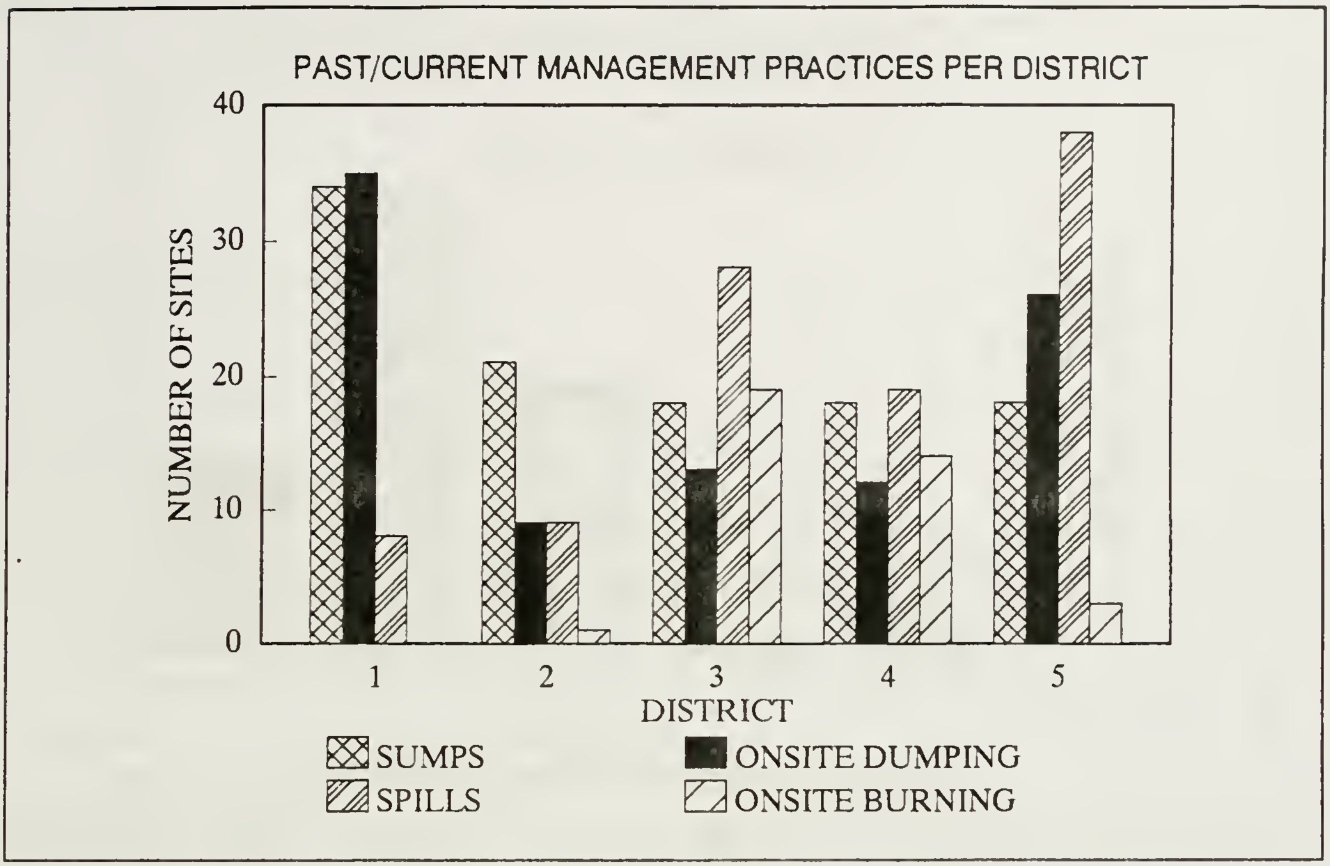


Figure 2. Of the 263 audit sites, 42% and 36% reported sumps and onsite dumping, respectively.

the utility companies but appear to be on MDT property. These may need to be sampled to determine if PCBs are present in the oils and, therefore, present a liability to MDT if released (Figure 4).

The Department has made a strong first step in instituting an effective materials and waste management program by implementing this audit program. Development of corrective action plans and the Hazardous Materials and Waste Management Plan will immediately follow to ensure these findings are addressed. However, in order to minimize the potential for these findings to reoccur, it's necessary to understand the factors contributing to the non-compliance, or the root cause. It is MSE's opinion that many of the root causes are institutional and can be described as follows:

- The Department has not provided the necessary job-specific training to employees to allow them to conduct their day-to-day operations in an environmentally safe and sound manner.
- Financial considerations often drive decision making, without any thought as to how this may affect environmental compliance.
- The Department has not instituted an internal audit/appraisal program to routinely monitor facility compliance with the regulations.

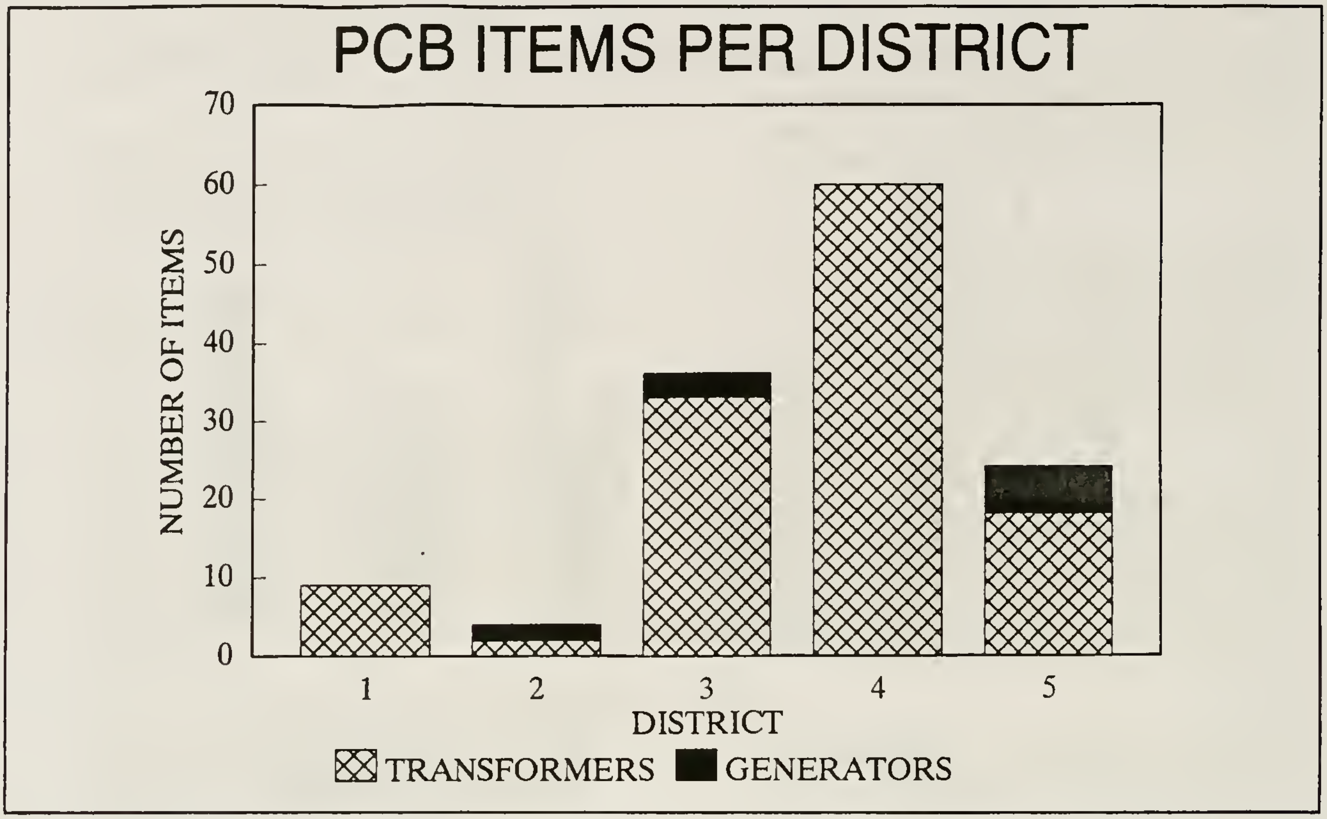
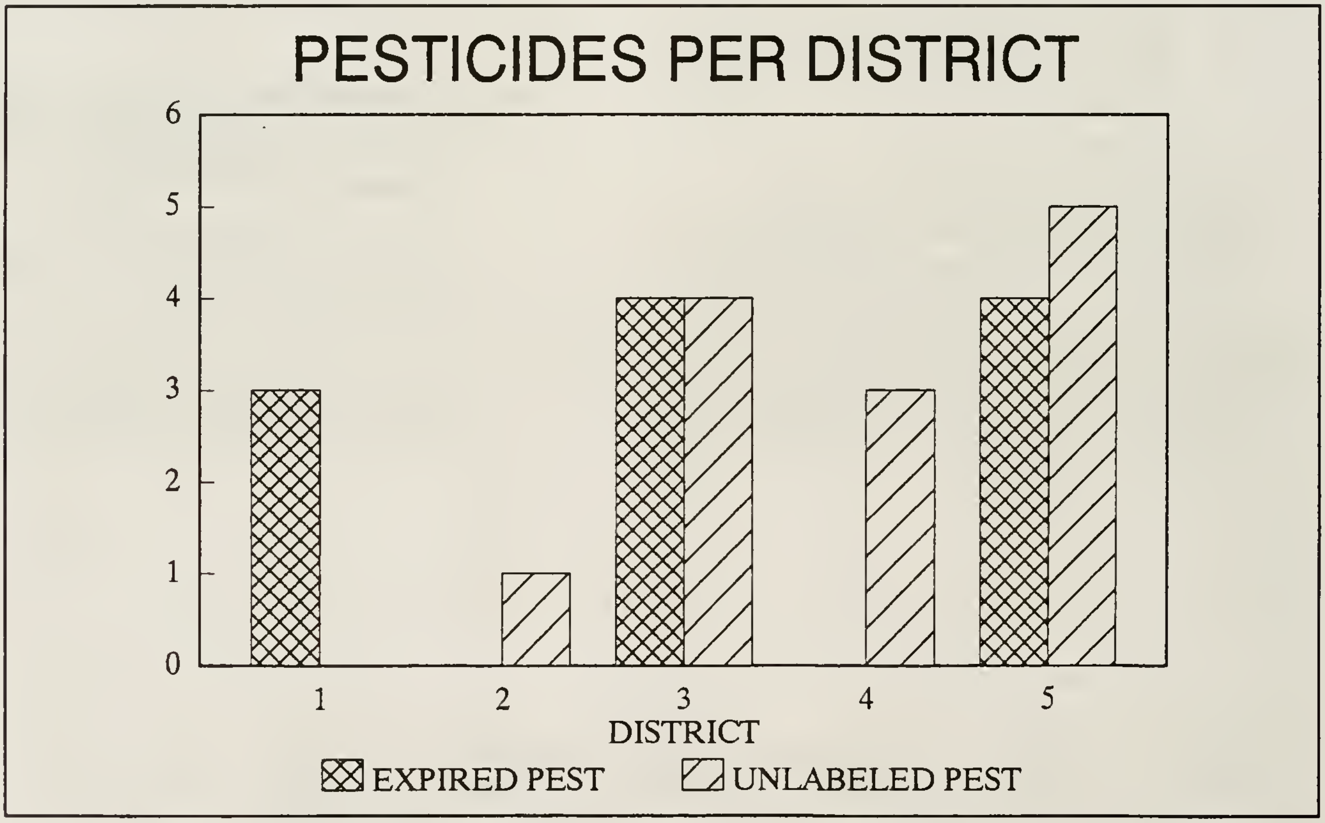


Figure 3. One hundred and twenty-two (122) transformers and eleven (11) generators were reported at MDT facilities.



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ATTACHMENT A - Completed MDT Abbreviated Environmental Audit Checklists

Note: Two sets of this attachment can be found in the Environmental and Hazardous Waste Bureau's files in Helena. Due to the large volume of checklists, this attachment is not included with this report.

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Table 4-1. MSE conducted verification audits at 17 facilities to verify the information provided in the MDT's abbreviated audit checklists and to identify any unique geographic issues or concerns. 20

ACRONYMS

BMP	best management practice
CECRA	Comprehensive Environmental Cleanup and Responsibility Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	U.S. Environmental Protection Agency
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
GVW	gross vehicle weight
LEPC	Local Emergency Planning Commission
MDHES	Montana Department of Health and Environmental Sciences
MDT	Montana Department of Transportation
MSDS	material safety data sheet
NRC	National Response Center
PCB	polychlorinated biphenyls
PCP	pentachloraphenal
RCRA	Resource Conservation and Recovery Act
ROW	right-of-way
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Commission
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
UST	underground storage tank
WMPP	waste minimization and pollution prevention

GLOSSARY OF TERMS

Abbreviated Audit Checklist—The checklists or questionnaires used by MDT's auditors to document information obtained during their assessments. These checklists were designed to gather more general information from which MSE could gauge MDT's environmental compliance status.

Assessment—As used in this report, refers to the environmental evaluations conducted by MDT's auditors. Since the auditors conducted more of a broad evaluation of environmental compliance, rather than a very detailed audit, their investigations have been termed "assessments".

Audit—As used in this report, refers to the detailed environmental investigations conducted by MSE's auditors to identify and document very specific areas of environmental non-compliance.

CECRA—The state statute that governs the identification, investigation, and cleanup of sites contaminated with hazardous substances that are not eligible for cleanup under the federal statute, CERCLA. Unlike CERCLA, petroleum products are considered a hazardous substance under CECRA.

CERCLA—The federal statute which provides the enforcement authority to EPA for cleaning up uncontrolled hazardous waste sites such as old dumps and spills.

Corrective Action Plans—Plans which will contain step-by-step milestones for addressing the findings of environmental non-compliance documented in this Baseline Assessment Report.

Finding—Any condition or work practice, that in judgement of MSE's auditors, may not satisfy applicable environmental regulations.

FIFRA—The statute which governs the field use of pesticides, registration for applicators and operators, and storage and disposal of pesticides and pesticide containers.

Hazardous Chemicals—Those chemicals which a facility uses and for which a Material Safety Data Sheet (MSDS) is required pursuant to the OSHA Hazard Communication Standard.

Hazardous Material—Any chemical, substance, or material that is considered "hazardous" under the Department of Transportation's (DOT) regulations. A material which is considered hazardous under DOT's regulations for shipping purposes, may or may not be considered hazardous under RCRA.

Hazardous Materials and Waste Management Plan—The final deliverable to MDT under MSE's contract. The plan will contain detailed procedures to assist MDT employees on the proper day-to-day management of hazardous materials and wastes.

Hazardous Substance—Any substance EPA has designated for special consideration under the Clean Air Act (CAA), Clean Water Act (CWA), and Toxic Substances Control Act (TSCA), and any hazardous waste identified under RCRA. This includes hundreds of substances; petroleum and natural gas are the only two substances that are not considered "hazardous substances" under CERCLA. However, under Montana's Mini Superfund law, petroleum substances are considered a hazardous substance.

Hazardous Waste—Any solid waste which is "listed" as a hazardous waste in 40 CFR Part 261 Subpart D or any waste which exhibits a "characteristic" of a hazardous waste as defined in 40 CFR Part 261 Subpart C. These include F, K, P, and U-listed hazardous wastes, and wastes that exhibit the characteristic of ignitability, corrosivity, reactivity, or toxicity.

RCRA—The statute which governs the generation, storage, transportation, and disposal of hazardous wastes.

Root Cause—Those factors that are resulting in or contributing to findings of non-compliance with environmental regulations.

SARA—The amendments to CERCLA which govern notification and reporting of hazardous and toxic chemicals that are used in the work place.

Solid Waste—Any solid, liquid, semi-solid or gaseous material which is discarded or intended to be discarded, and has no beneficial use.

TSCA—The statute which governs the storage and disposal of PCBs and PCB contaminated equipment.

UST System—Any underground storage tank system, including associated piping, which has 10 % or more of its contents beneath the ground surface.

Montana Department of Transportation Environmental Baseline Assessment Report

1.0 INTRODUCTION

This report provides a detailed assessment of the Department's current environmental compliance status. This cataloging effort is a key step in developing and implementing a Hazardous Materials and Waste Management Plan for the Montana Department of Transportation.

In accordance with the Provisions of the Montana Department of Transportation (MDT) Hazardous Materials Management Plan Contract, the Technical Services Division of MSE, Inc., is pleased to submit this Environmental Baseline Assessment Report. The report satisfies the requirements of Article I, Section 1(B) of the Contract.

1.1 Purpose and Scope

The baseline assessment is the first phase of a three-phase process that is being implemented by the MDT under the Contract. The primary purposes of the Environmental Baseline Assessment Report are:

- Identify the hazardous materials used in, and the wastes generated by, various maintenance activities
- Formulate a picture of the environmental compliance status at MDT facilities based upon information gathered by MDT and MSE auditors
- Identify and briefly discuss special environmental issues that were too far beyond the scope of this project to formally address in the auditing process but are of potential interest and concern to the MDT
- Identify institutional issues that may be causing or contributing to the noncompliance issues observed during the audits.

During Phase II, corrective action plans will be developed and implemented to correct the noncompliance issues identified in the baseline assessment. A Hazardous Materials and Waste Management Plan will be developed in Phase III to provide the necessary guidance and direction to maximize future compliance with applicable statutes. Figure 2.1 illustrates the process, and Section 2 discusses all three phases in more detail.

The information gathered and documented in this report is more extensive than was forecast when the project began. When the contract was developed, it was anticipated that 68 facilities and 116 section sites (184 locations in all) would be audited by MDT auditors. Actually 263 assessments have been conducted, 43% more than originally estimated. In the terms of the contract, MSE was required to conduct independent audits at 10 facilities to verify the accuracy and completeness of the information gathered by the MDT. Given the potential diversity between districts, the number of assessments, and the variety of facilities evaluated, MSE actually conducted 17 verification audits. The information gathered has been collated, and a sound database has been developed. This database provides the foundation upon which a competent hazardous materials and waste management program can be implemented.

It should be noted that the MDT's environmental assessments focused on the following five major environmental statutes:

- RCRA (Resource Conservation and Recovery Act) governing management of solid and hazardous wastes
- CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act), a federal act, and CECRA (Comprehensive Environmental Cleanup and Responsibility Act), a state act, providing for management of hazardous substances
- FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) regarding the management of pesticides and herbicides
- TSCA (Toxic Substances Control Act) pertaining to management of PCBs.

These five statutes are the primary laws addressing the environmental issues associated with hazardous substances and wastes. There are additional environmental statutes that may apply to the MDT's operations. Where pertinent to MDT, these requirements and related issues are identified and briefly discussed in Section 7.

The use of hazardous substances and the generation, treatment, storage, and disposal of hazardous wastes raises a variety of issues concerning occupational safety and health laws and regulations. With the exception of the notification and reporting requirements for hazardous substances under Title III of the Superfund Amendments and Reauthorization Act (SARA), the subject of worker safety and health was beyond the scope of this project.

1.2 Organization

Section 2 summarizes the logic that guided the implementation of the assessments and development of this Environmental Baseline Assessment Report. This section also discusses the relationship between the three phases of the contract. Additionally, the historical activities that led to development of this report are summarized.

Section 3 presents the information obtained from the assessments conducted by MDT auditors. Section 3.1 identifies and describes those MDT activities that use hazardous materials and/or generate hazardous wastes. Activities addressed include maintenance of roadways and roadsides, equipment and vehicles, facilities, laboratories and support facilities, airports, and gross vehicle weight (GVW) stations. Sections 3.2 through 3.5 present the data collected and documented by MDT auditors in their abbreviated audit checklists. Based upon the information reported, the environmental compliance status of MDT facilities is summarized with respect to RCRA, CERCLA/CECRA, FIFRA, and TSCA.

Section 4 identifies those facilities where MSE conducted verification audits and provides an evaluation of the information reported in the MDT's abbreviated audit checklists. Section 5 summarizes MSE's observations and findings from the verification audits and provides an analysis of the MDT's environmental compliance status in terms of materials management, waste management, and recordkeeping and reporting.

Root causes of the issues identified in the audit process are examined in Section 6. Finally, Section 7 identifies and briefly discusses other issues of potential concern to the MDT, including management of treated timber, stormwater runoff, used oil, right-of-ways, and other property owned by the MDT.

2.0 THE HAZARDOUS MATERIALS AND WASTE MANAGEMENT PLANNING PROCESS

As a result of the assessments conducted, environmental baseline conditions are now documented for MDT facilities throughout the State. MSE will assist the Department in instituting a corrective action program and developing a Hazardous Materials and Waste Management Plan to ensure future compliance with environmental regulations.

MSE was awarded a Contract by the MDT in April 1991 to develop a Hazardous Materials and Waste Management Plan. The overall objective of the contract is to develop procedures which will instruct MDT employees on the proper day-to-day management of hazardous materials and wastes. MSE's support to the MDT under the Contract can be divided into three distinct phases: the baseline assessment, corrective action planning, and management of the MDT's environmental liabilities. These phases are illustrated in Figure 2-1 and are discussed in greater detail in the following sections.

As a first step toward supporting the MDT in the development of an environmental waste management program, a Waste Management Policy was prepared. The policy communicates the MDT's commitment to protecting worker safety and health, preventing pollution and minimizing waste generation, and providing necessary training for MDT employees on proper management of hazardous wastes. This policy conveys the following:

> *It is the Montana Department of Transportation's (MDT's) policy to conduct its waste management operations in an economic, efficient, safe, and environmentally sound manner. MDT recognizes that waste management is of paramount importance and concern to the Department to conserve limited resources, ensure efficiency in operations and for the protection of employees, the public, and the environment. To that end, MDT is firmly committed to incorporating waste management goals in the formulation and implementation of MDT programs and missions. Finally, it is MDT's policy that waste management efforts be carried out consistently across*

Contract Phase	Associated Tasks	Purpose
Baseline Assessment	MSE develops audit training manuals MSE conducts audit training MDT conducts audits MSE verifies MDT audits MSE prepares Environmental Baseline Assessment Report	Document environmental baseline conditions at MDT facilities throughout the State
Corrective Action Planning	MSE develops corrective action plans (CAPs) MSE conducts CAP training MDT and Contractor implement CAPs MSE verifies CAP implementation	Address the findings identified in the Environmental Baseline Assessment Report
Environmental Management	MSE develops Hazardous Materials Management Plan for MDT implementation	Develop detailed procedures to ensure proper management of hazardous materials and wastes and to minimize future liabilities

Figure 2-1. The information obtained from the audit process will assist the MDT in implementing corrective actions and developing the Hazardous Materials and Waste Management Plan.

all operations and among all field organizations and programs. The Department will ensure compliance to this policy by:

- *Detecting and correcting existing problems which have resulted from historic waste management practices;*
- *Instituting and enforcing good waste management practices and procedures for the identification, handling, storage and disposal of generated wastes, with a fundamental emphasis on waste minimization and pollution prevention;*
- *Anticipating and addressing potential problems related to generating, identification, handling, storage, or disposal of wastes before they pose a threat to public health or safety, MDT missions, or the environment;*
- *Complying with the letter and spirit of all applicable waste management statutes, regulations, and standards; and*
- *Implementing training programs designed to enhance employee awareness of waste management, hazardous wastes, waste minimization, applicable regulations, and pollution prevention.*

2.1 The Audit Process

In July 1992 MSE prepared the *Montana Department of Transportation Environmental Compliance Audit Training Manual*. The manual was designed to provide the information needed by MDT auditors to effectively conduct environmental compliance audits at MDT facilities. Volume 1 included introductory information on the four major environmental laws and regulations that were covered during the audit training course: RCRA, CERCLA/CECRA, FIFRA, and TSCA. Volume 2 provided the materials that were used by the auditors during the audits. These manuals were intended to serve two purposes. First, the manuals were to be the principal tool used by the auditors to assist them in conducting the audits. Second, and of equal importance, they were intended as the principal resource from which an ongoing self-assessment program could be established.

From July 20 to 22, MSE provided training to 40 MDT employees to assist them in conducting their audits. The training course summarized the protocols and procedures for performing audits and the regulations that are pertinent to the MDT's daily activities. Classroom participation was encouraged through the use of case studies and an actual audit of the Helena Fairgrounds Maintenance Facility.

Following completion of the training, MSE developed a Safety and Health Plan for the auditors to assist them in recognizing and evaluating hazards during the audits. Based on input MSE received during the training, it appeared that the detailed audit checklists would be too technical for the auditors given their limited exposure to the environmental regulations. In response, MSE developed abbreviated audit checklists which were designed to gather more general information from which MSE could still gauge the MDT's environmental compliance status. As a result, MDT auditors conducted a broad environmental assessment of MDT facilities instead of the detailed environmental compliance audit originally planned.

From August 1992 through March 1993, MDT auditors conducted environmental assessments at 263 facilities. The number of assessments conducted in each District and Division is shown in Figure 2-2. The facilities evaluated include division complexes, section sites, laboratories and support facilities, airports, rest areas, stockpiles, gross vehicle weight (GVW) stations, and property adjacent to MDT facilities. The auditors identified the hazardous materials used at the location, the wastes generated by the facility, and the processes used to manage these materials and wastes. This information was recorded in the abbreviated audit checklists (see Appendix A for an example checklist and Attachment A for the actual checklists that were completed and submitted by the auditors) .

In December, MSE conducted verification audits at some of these facilities to accomplish the following objectives:

- Verify the information reported by MDT auditors in the abbreviated audit checklists
- Assess environmental compliance in more detail using the detailed audit checklists in the training manual
- Obtain a better understanding of work practices and procedures that are resulting in non-compliance with the regulations or that present potential liability to the Department
- Identify noteworthy practices that would benefit all MDT facilities.

The contract required verification audits of 10 sites: two districts, five section sites, the Helena Headquarters section site, one GVW station, and one airport. MSE conducted a total of 17 verification audits and visited sites in all five districts to identify unique geographical issues and concerns. Figure 2-3 identifies the verification audit locations.

In general, MSE found the MDT's abbreviated audit checklists to be thorough and accurate. The information gathered by MDT and MSE auditors was organized and evaluated to develop this Environmental Baseline Assessment Report.

2.2 The Corrective Action Process

The next phase of the contract is designed to correct the noncompliance issues that were discovered during the audit process and documented in this Environmental Baseline Assessment Report. Two types of corrective action plans will be developed: those that deal with materials and waste management issues that can be addressed internally by the MDT and those that will require some type of investigation and remedial action with specialty skills or equipment. The issues identified in Section 5 of this report will be prioritized for implementation of corrective actions.

Once the corrective action plans are prepared, MSE will conduct a training session in Helena for MDT personnel to assist them in implementing these corrective action plans. Following implementation, MSE will audit some of the sites to verify that the issues have been addressed in accordance with the plans.

2.3 Management of the MDT's Environmental Liabilities

The final phase of the contract involves developing the Hazardous Materials and Waste Management Plan. This plan will essentially be a procedures manual which will instruct MDT employees on the proper day-to-day management of hazardous materials and wastes. This procedures manual, in addition to the *Montana Department of Transportation Environmental Compliance Audit Training Manual*, will provide the information necessary for the MDT to minimize future environmental liability and achieve ongoing compliance with environmental regulations. Occasional updates or revisions to the manual will be required to reflect regulatory changes. It is anticipated that revisions to the

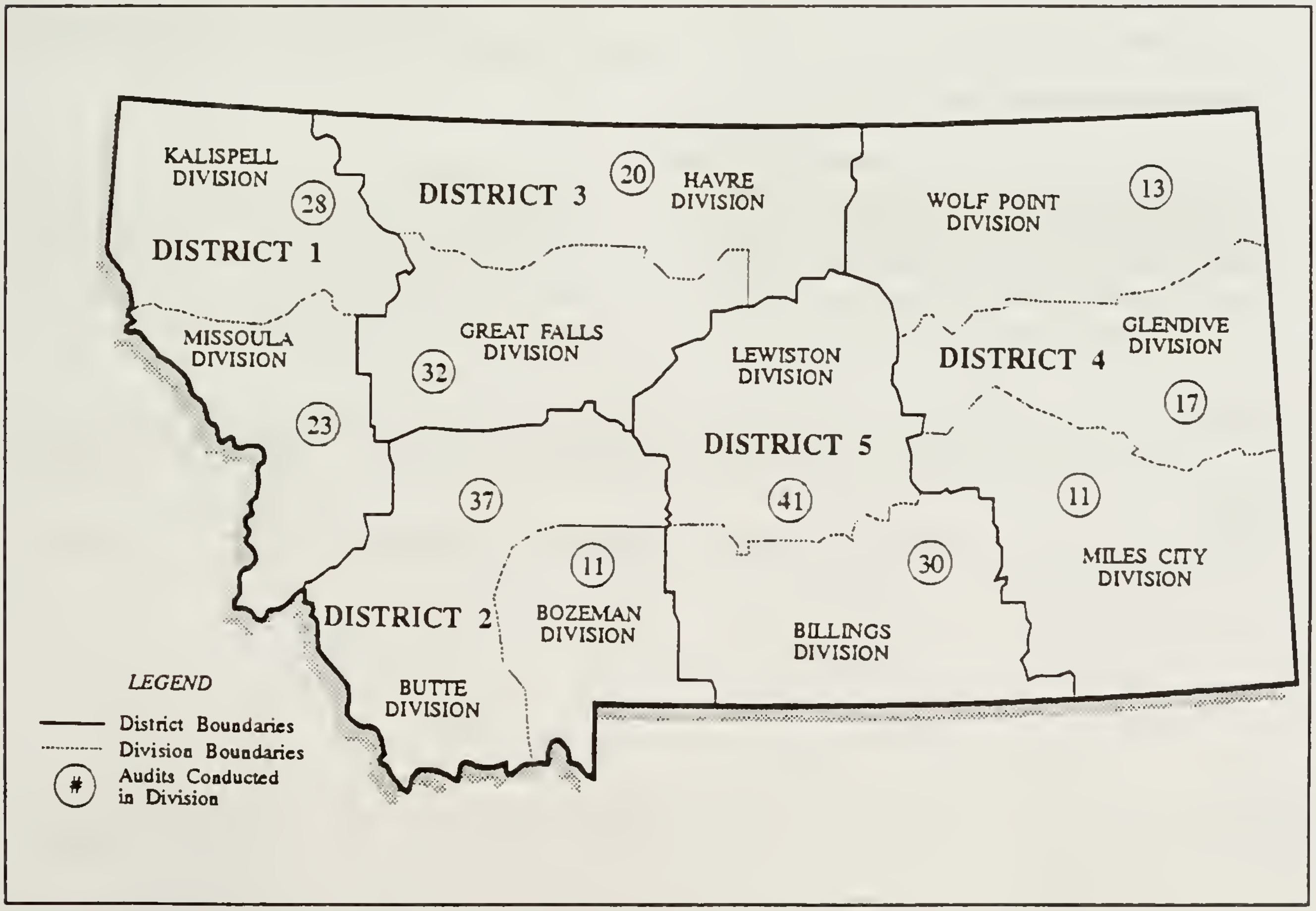


Figure 2-2. MDT employees conducted audits at 263 facilities in all five districts.

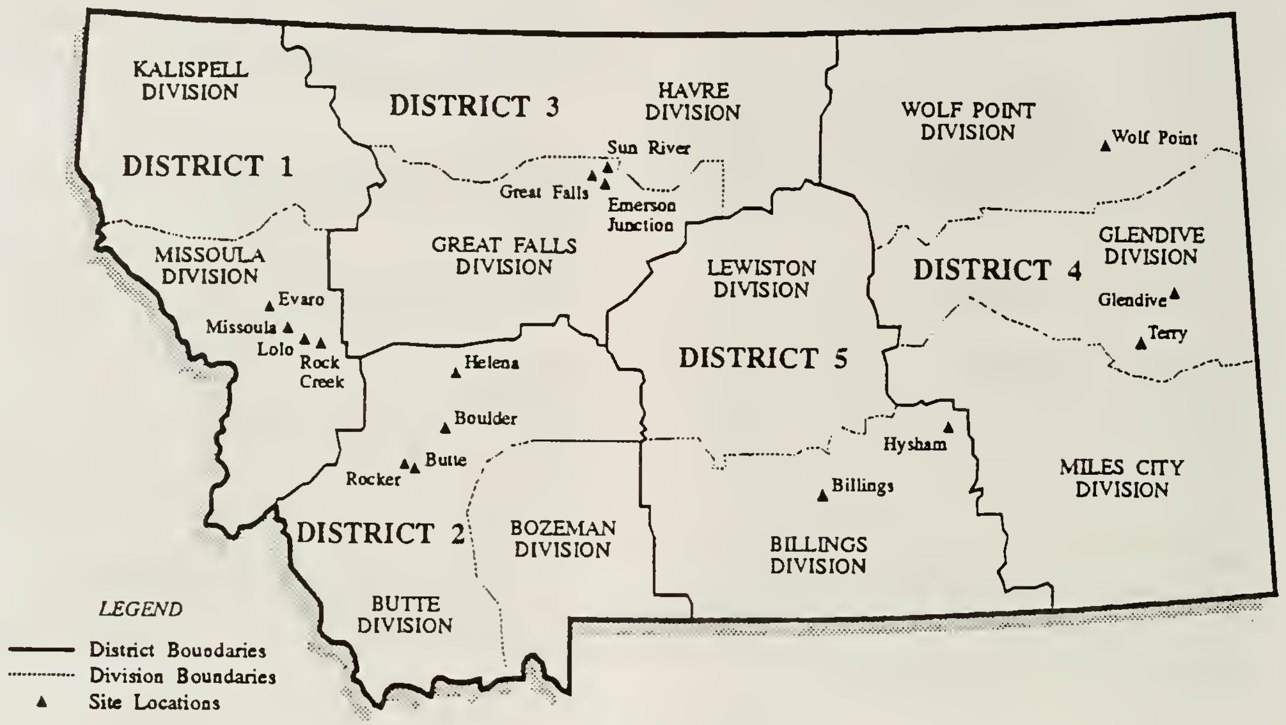


Figure 2-3. MSE conducted audits at these locations to verify the information gathered by the MDT auditors and assess environmental compliance in more detail.

manual will be accomplished by departmental personnel responsible for regulatory oversight of MDT's operations. The Hazardous Materials and Waste Management Plan is MSE's final deliverable to MDT under the current Contract.

3.0 INFORMATION OBTAINED FROM MDT AUDITS

MDT auditors gathered valuable information regarding the baseline environmental conditions at Department facilities throughout the State. The database that has been developed provides the foundation upon which a competent Hazardous Materials and Waste Management Program can be implemented.

As discussed in Section 2, MDT auditors conducted environmental assessments from August 1992 through March, 1993. As shown in Table 3-1, 263 sites have been evaluated to date. It should be noted that some of the sites have more than one function, such as a section site that is also a maintenance shop. Therefore, while only 263 assessments were conducted, more than 263 facilities were evaluated, as reflected by the totals in the table.

The abbreviated audit checklists contain two types of information that are discussed in this section:

- The hazardous materials used in and the wastes generated by various maintenance activities
- The environmental baseline conditions at these locations.

Section 3.1 describes the types of maintenance activities that use hazardous materials and generate hazardous wastes, and Sections 3.2 through 3.5 summarize key environmental compliance information obtained by MDT's auditors. A more detailed discussion of past and current work practices and the status of environmental compliance at MDT facilities is presented in Section 5, "MSE Verification Audit Findings."

Note that the information provided in Section 3.1 is a summary of the information provided by all of MDT's auditors. The materials and waste management practices of one district or division may vary from another. Therefore, the practices discussed in the following section may not occur at every district, and may even vary within a given district. For facility-specific information, see the abbreviated audit checklists contained in Attachment A.

It should also be noted that the statistical information provided in Sections 3.2 through 3.5 is reflective of the level of detail and accuracy of information provided by MDT's auditors in the checklists. Direct correlations between a facility's actual environmental compliance status and the information reported may not always be possible. For instance, information reported may indicate that one district has a much larger volume of waste to be disposed of than the other districts. While this conclusion may be true, it is also possible that more complete and thorough information was gathered from that district. Review of MDT's abbreviated audit checklists, in aggregate, suggests that more complete information was gathered by some auditors. Despite these variances, a good overall picture of MDT's environmental compliance status was obtained.

3.1 Hazardous Materials Use and Waste Generation

MDT is responsible for the design, construction, administration, and maintenance of the highway system in Montana. This section focuses primarily on maintenance responsibilities, since this is where the majority of hazardous materials use and waste generation occurs.

Table 3-1. To date, 263 audits have been conducted by MDT auditors in all five districts throughout the state. Some of the facilities are both section sites and maintenance shops, but were counted as one audit, not two.

District	Maintenance Shop	Section Site	Laboratory	Airport	Stockpile	Rest Area	GVW Station
1	3	37	1	1	2	4	7
2	4	25	2	3	0	5	3
3	13	12	2	6	16	2	4
4	9	28	2	1	0	5	3
5	13	19	1	2	33	8	2
Total	42	121	8	13	51	24	19

The specific activities that are examined include: roadway repair, striping, winter maintenance, and maintenance of roadsides, equipment and vehicles, facilities, airports, laboratories and support facilities, and GVW stations.

Each of the following sections contains a table which summarizes:

- Potentially hazardous materials used in maintenance activities
- The solid and hazardous wastes generated
- A qualitative assessment of whether the waste is potentially recyclable
- A qualitative assessment of the potential liabilities that the waste confers to MDT.

For purposes of this discussion, recyclable wastes include those wastes that can be burned for energy recovery, distilled or reclaimed, stored for reuse, or provided to another user. The following factors were considered when assessing potential liability:

- Whether the waste is a solid or hazardous waste
- The volume of materials used or waste generated
- The costs associated with proper disposal of the wastes
- The costs associated with investigation and cleanup should the material or waste be released to the environment in significant quantities.

While these assessments are qualitative, they will serve as a tool for prioritizing resources for implementation of corrective actions. For example, while inks used in the sign shop may be a hazardous waste, only small quantities are used as compared to striping paints. As a result, the potential liability to the Department from striping paint is judged to be greater than it is for inks.

3.1.1 Roadway Repair. The primary objectives of roadway repair are to correct potential surface hazards such as potholes and abrupt depressions, maintain and restore skid resistance, and prevent penetration of water and further deterioration of the roadway. The hazardous materials used and the types of wastes generated from these activities is summarized in Table 3-2 and discussed further below.

Asphalt, road oil, rejuvenator, crack sealant, slurry, concrete additives, curing compounds, and tack are the primary materials used in the repair of roadways. Any "waste" generated is essentially excess quantities of these products that cannot be used for another job. Excess road oil is either used on the roadway until it's depleted, stored for reuse, or dumped. Tar pots and crack sealers are usually cleaned with diesel, and this mixture is either stored for reuse on other projects or is dumped. Excess

Table 3-2. Most of the waste generated from roadway repair, striping, and winter maintenance activities is potentially recyclable. The large quantity of paints and solvents that can be generated presents a high liability to the Department.

Hazardous Material Used	Waste Generated	Waste Type	Recyclable	Liability
Road Oil	Excess road oil	Solid	Yes	Medium
Asphalt	Excess asphalt	Solid	Yes	Low
Rejuvenator	Excess rejuvenator	Solid	Yes	Low
Crack Sealant	Excess crack sealant	Solid	Yes	Low
Tack	Excess tack	Solid	Yes	Low
Curing Compounds	Empty containers	Solid	No	Low
Concrete Additives	Empty containers	Solid	No	Low
Yellow Striping Paint	Unused/waste paint	Hazardous	Yes	High
White Striping Paint	Unused/waste paint	Solid or hazardous	Yes	Medium
Solvents (Toluene)	Unused/spent solvent	Hazardous	Yes	High
Salt	Snow melt/runoff	Solid	No	Low
Magnesium Chloride	Snow melt/runoff	Solid	No	Low

tack can also be stored and reheated for future use, and asphalt mixes that remain at the end of a job are often recycled. For instance, through the cold milling process, the upper few inches of asphalt that is removed has either been discarded as a waste product, treated in a batch plant to make new recycled asphalt pavement, or given to the counties for their use. The Department is currently limiting cold milling production in lieu of hot in-place recycling. Through this process, the asphalt is heated through a train, new mix is added, as necessary, and the resultant mixture is rolled into place and overlayed. In this process 80-100% of the resulting mixture is composed of the original asphalt.

3.1.2 Striping. Striping or pavement marking is a mechanism used by the Department for traffic control. As shown in Table 3-2, the primary products that are used are yellow and white striping paints and solvents for cleaning out paint trucks, tanks, and nozzles. While methylene chloride and other solvents may have been used in the past, toluene is the solvent most frequently used now. The wastes that are generated include spent or unused paints, spent toluene, mixtures of paints and solvents, and soils contaminated by paint spills.

Sampling and analysis conducted on waste paint throughout the State reveals the following. Please note that it is the responsibility of the generator to determine if his/her waste paint is hazardous, so this should only be viewed as a broad observation:

- **Hazardous Waste Paint**
  - Liquid yellow paints are often a "characteristic hazardous waste" under RCRA because they are ignitable and contain leachable/toxic concentrations of lead (> 5 ppm).
  - Solid yellow paints are also toxic for lead but are not ignitable.
  - Liquid white paints are ignitable.
- **Non-hazardous Waste Paint**—Solid white paints are non-hazardous since they are neither ignitable nor toxic.

In an attempt to minimize waste generation and the use of toxic chemicals, the Department has been investigating the use of reflective thermoplastic and epoxy pavement marking materials. Instead of spraying striping paint directly on the pavement, these markings are layed into grooves cut into the pavement. The advantage of these markings is that they do not contain TCLP concentrations of metals and are thought to be more durable.

3.1.3 Winter Maintenance. The purpose of winter maintenance activities is to maximize driving visibility and minimize hazardous driving conditions caused by snow accumulation and icy roads. In addition to snow removal, winter maintenance activities involve the application of sand, salt or liquid deicing chemicals such as magnesium chloride to the roadways to minimize accumulation of snow and ice. None of these materials are considered a hazardous substance under CERCLA, and as shown in Table 3-2, no hazardous wastes are generated as a result of these activities. Although these chemicals are not considered a hazardous substance by law, they could have a detrimental impact on the environment and represent a potential liability if released in large quantities. Methods for preventing or minimizing their release is discussed further in Section 7, "Other Issues of Potential Concern."

3.1.4 Roadside Maintenance. Roadside maintenance activities occur within the right-of-way limits owned by MDT. One of the primary objectives of roadside maintenance is to control noxious weeds and vegetation that present sight problems, fire hazards and drainage problems.

The only roadside maintenance activity that uses hazardous materials and generates hazardous wastes is the chemical spraying of herbicides and the application of soil sterilants. Some District and Division offices have licensed pesticide applicators and operators while others contract this out to the local county weed control board. The types of herbicides that are used throughout the State are identified in Table 3-3. If the herbicides are properly managed, i.e., used until the contents of the containers are depleted and the containers are properly rinsed, no hazardous waste is generated.

3.1.5 Equipment and Vehicle Maintenance. Equipment and vehicles owned by MDT are routinely maintained and repaired to ensure they remain in good operating condition. Maintenance activities include changing out motor oil, hydraulic oil, oil filters, transmission fluids, antifreeze, and batteries; lubricating equipment and vehicle parts; washing and steam cleaning equipment and vehicles; carburetor cleaning; and, parts cleaning with a suitable solvent or degreaser.
Table 3-4 identifies the materials used and the types of wastes that are generated from equipment and vehicle maintenance activities.

Many of the wastes that are generated from this type of maintenance activity are collected and burned for energy recovery or recycled with a contractor hired by MDT to manage these wastes. For instance, used oils are collected for energy recovery by Oily Waste Processors in Great Falls, Montana and spent solvents are collected

Table 3-3. A large variety of pesticides are present at MDT facilities. Many of these have been rendered ineffective due to freezing or are no longer planned for use. These pesticides either need to be given to a suitable user or properly disposed of.

Hazardous materials used

2,4-D	Kraver IDF	Klean Up	Arsenal
Tordon 22K	Atrazine	Amorol	Banvel
Round-up	Trooper	Princep 80	Hi Pep
Embark	Hi Dep	Dow Grass Killer	Beutil
Isotox	Amine 2,4-D	Amino 4	Oust
Pramitol	Weed-B-Gone	Selective Herb #1	Buctril
LV6	Prometon	Mr. Turf	Hyvar
Escort	Drovar	Rodeo	Simazine
Spike	Combat	Hartford	Notox

Waste generated	Waste type	Recyclable	Liability
Unused or outdated pesticides	Hazardous	No	High
Empty containers	Solid	No	Low

by Safety Kleen in Spokane, Washington and Bismarck, North Dakota, for distilling. Acid-lead batteries and tires are recycled by local vendors. Other wastes are routinely disposed of as a solid waste in the local landfill.

3.1.6 Facility Maintenance. It is MDT's objective to ensure facilities are kept in a neat, clean, sanitary, and serviceable condition. This requires the use of various paints, varnishes, thinners and cleaning agents. Table 3-5 identifies the materials that are used to maintain facilities and the types of wastes that are generated.

Most of the cleaning agents, spray paints, and thinners found at facilities are either used until their contents are depleted or are discarded because they are outdated or can no longer be used. These wastes are generally disposed of in the dumpster and local landfill.

Several of MDT's facilities have machine shops which generate metal shavings that are either disposed of in the dumpster or collected with other scrap metal for recycling. Some facilities are also equipped with oil-fired space heaters for energy recovery of used oil. Treated timbers that have been removed from service, i.e., guardrails and guardposts, can also be found at facilities. These are either recycled for other purposes, disposed of in the local landfill, or accumulated onsite in waste piles.

3.1.7 Laboratories and Support Facilities. MDT has 11 satellite laboratories located throughout the State for analyses of materials used in roadway construction. Helena also houses a chemistry laboratory for asphalt testing and verifying chemistry specifications for various products used by the Department, such as cement, paint, and fertilizers. Water and soils found at construction sites are also analyzed for parameters such as corrosivity to materials used in roadway construction i.e., zinc and steel. Table 3-6 identifies the types of hazardous materials used and waste generated from these laboratories.

The primary purpose of the satellite labs is to analyze the quality of asphalt and aggregate used in roadway mixes. The four tests most routinely performed in the materials labs are the volume swell, marshall, vacuum extraction, and cleanliness tests. Of the four, the cleanliness test is the only one that does not use hazardous materials.

Mercury is used in the volume swell tests to measure the displacement of briquettes and determine the potential of the aggregate to swell upon contact with water. Stoddard solvent is used to clean the molds used in the marshall tests. While the use of other solvents has been explored, stoddard appears to be the only solvent that is capable of removing the asphalt mix from the molds. In the vacuum extraction tests, trichloroethylene is used to measure the content of the asphalt in the road mix. The stoddard, mercury, and trichloroethylene are typically reused and/or reclaimed. 1,1,1-trichloroethane is also used in the materials lab to clean viscometers, and the spent solvent is distilled in the lab for reuse.

Table 3-4. Most of the wastes from equipment and vehicle maintenance activities are generated in small quantities (except used oils and solvents). Management of used oils and solvents presents the greatest liability to the Department.

Hazardous Materials Used	Waste Generated	Waste Type	Recyclable	Liability
Motor Oil	Used Oil/Filters	Solid	Yes	Medium
Hydraulic Oil	Used Oil/Filters	Solid	Yes	Medium
Antifreeze	Used Antifreeze	Solid	Yes	Low
Stoddard Solvent	Unused/Spent Solvent	Hazardous	Yes	High
Lubricating and Transmission Fluids	Empty Containers	Solid (if empty)	No	Low
Brake and Starting Fluid				
Lithium Grease				
Diesel Fuel Supplement				
Terminal Cleaner*				
Enamel Reducers/Thinners*				
Spray Paints*				
Epoxy Catalyst				
Naptha				
Corrosion/Rust Inhibitor				
Lead-Acid Batteries	Used Batteries	Hazardous	Yes	Medium

*Indicates a potential hazardous waste if more than 3%, by volume, of the product is discarded, or if more than 1" of residue remains in the container.

Table 3-5. Most of the hazardous materials used to maintain facilities are present in very small quantities and present minimal liability to the Department.

Hazardous Materials Used	Waste Generated	Waste Type	Recyclable	Liability
Aluminum Paints	Unused/Waste Paints	Solid or Hazardous	Yes	Low
Strippers and Thinners	Unused/Spent Thinners	Hazardous	Yes	Low
Brush Cleaner	Unused/Spent Cleaners	Solid or Hazardous	Yes	Low
Varnish and Enamel Paints	Unused/Waste Paints and Varnishes	Hazardous	Yes	Low
Paint Primers	Unused Primers	Solid or Hazardous	Yes	Low
Base and Floor Adhesives	Empty Containers	Solid	No	Low
Deliming Agents	Empty Containers	Solid	No	Low
Fluorescent lightbulbs	Spent Mercury Lamps	Solid or Hazardous	Yes	Low

Table 3-6. Most of the spent solvents that are generated from laboratory analyses can be reclaimed or recycled. Opportunities are also available to reclaim silver from stop bath fixer used in the photography lab.

Hazardous Materials Used	Waste Generated	Waste Type	Recyclable	Liability
Stoddard Solvent Methylene Chloride 1,1,1-trichloroethane Trichloroethylene	Unused/Spent Solvent	Hazardous	Yes	Medium
Citrus-based Solvents	Spent Solvent	Solid or Hazardous	No	Low
Hydrochloric and Nitric Acid	Unused/Waste Acids	Hazardous	Yes	Medium
Lab Chemicals/Reagents	Unused/Off-Spec Products	Solid or Hazardous	Maybe	Medium
Formaldehyde	Spent Stock Solution	Solid	No	Low
Glycerin	Spent Stock Solution	Solid	No	Low
Mercury	Brickettes Containing Trace Amounts of Mercury	Solid or Hazardous	No	Low
Inks/Paints/Thinners	Unused/Waste Inks, Paints, Thinners	Hazardous	Maybe	Low
Stop Bath Fixer	Unused/Spent Fixer Solutions	Hazardous	Yes	Low
Developer	Unused/Spent Developer	Solid	No	Low
Toner	Unused/Spent Toner	Solid	No	Low

The chemistry lab in Helena uses many different types of reagent chemicals for specification tests. Lab solutions are routinely flushed with water and discharged to the city sewer. Out-dated or off-specification chemicals are either flushed to the sewer or stored. The lab currently has several boxes of chemicals that are no longer needed, cannot be used, and require proper disposal.

Support facilities located at the Helena Headquarters main complex include a sign shop, photo lab, and print shop. The sign shop uses various inks, paints and thinners and generates waste inks. The photo lab generates spent photoprocessing chemicals such as fixer (contains recoverable concentrations of silver), the majority of which is discharged to the city sewer system. The print shop generates spent developer solutions; solutions are evaporated under a hood and the solids are disposed of in the dumpster. Dried toner containers are also disposed of in the dumpsters.

3.1.8. Airports. MDT utilizes approximately 13 airfields across the State. A few of the airfields are equipped with hangers and buildings which are leased to a private owner. Most of the airfields are turf, and few of them conduct any type of maintenance activity or use pesticides. Maintenance activities are limited primarily to oil changes, tuneups, cleaning, and washing activities. Floor drains present at these hangers drain to dry wells, french drains, or septic systems.

As seen in Table 3-7, the materials primarily used at those airports that conduct maintenance activities include oil, paints, solvents, and cleaners. Within the hangers, private operators are likely to be using solvents, other cleaners, batteries, fuels, paints, and thinners. Due to the limited use and remote location of these airfields, there is the potential for dumping of wastes.

Pesticides are apparently used at only a few airfields. No information was developed regarding the historic use of these facilities by aerial pesticide applicators. However, past uses of this kind commonly resulted in significant pesticide contamination. It is not clear what, if any, arrangements are made for proper storage and disposal of pesticides by users of this type.

3.1.9 Gross Vehicle Weight Stations. GVW stations are maintained by the Department to monitor the

Table 3-7. Maintenance activities are only conducted at a few of the airfields. Because of the small quantities of hazardous materials or wastes present, the liability associated with the management of the airfields is judged to be low.

Hazardous Materials Used	Waste Generated	Waste Type	Recyclable	Liability
Oil	Used Oil/Filters	Solid	Yes	Low
Paints	Used/Spent Paints	Solid or Hazardous	Yes	Low
Solvent	Unused/Spent Solvent	Hazardous	Yes	Low
Pesticides	Excess Pesticides	Hazardous	Yes	Low
Cleaners	Used/Spent Cleaners	Solid or Hazardous	No	Low
Lead-Acid Batteries	Used Batteries	Hazardous	Yes	Low

loads carried by haul trucks on Federal and State highways. The hazardous materials used include lubricating oils for the scales and solvents for degreasing. Because few activities are conducted at the stations, only small quantities of hazardous materials should be stored. However, treated timbers and pesticides have also been found at the stations. Table 3-8 summarizes the materials used and wastes generated at GVW stations.

3.2 RCRA Compliance

RCRA regulations that are pertinent to MDT's activities include those for management of petroleum products in underground storage tanks (USTs) and the generation, storage, and disposal of hazardous waste. The information presented in this section was obtained from MDT's abbreviated audit checklists and is summarized by district. The information includes the generator status of MDT's facilities, the quantity of wastes that need to be characterized and disposed of, and USTs that require upgrading.

Figure 3-1 presents the hazardous waste generator status of MDT's facilities by district. Of the 263 sites audited, the majority (128) do not claim to generate hazardous waste. Eighty-nine (89) are conditionally exempt small quantity generators, 12 sites are small quantity generators and 3 sites are large quantity generators. District 2 has the largest number of sites that generate hazardous waste (26).

A conservative estimate of the quantities of potentially hazardous waste to be characterized and disposed of is presented in Table 3-9. Of the 86 sites that reported hazardous waste at their facilities, 10 sites did not identify the quantities of waste present. Because of the difficulty some auditors had in distinguishing between products and wastes, it is possible that some sites only reported a portion of the hazardous wastes present. Therefore, the total quantity of wastes that will need to be disposed of may exceed the estimates shown in Table 3-9.

The wastes that were documented in the audit checklists were divided into the following categories for ease of analysis: paints, solvents, oils, pesticides and herbicides, unknowns, and miscellaneous. Approximately 46,500 gallons of waste presently exist on MDT sites state-wide (see Table 3-8 and Figure 3-2). Paint wastes comprise the largest contribution (approx. 18,100 gallons) of the total amount of waste present. Waste oil represents the second largest contribution (approx. 15,400 gallons).

Table 3-8. Based upon verification audits conducted at GVW stations, little hazardous material or waste was found that presents any real liability to the Department.

Hazardous Materials Used	Waste Generated	Waste Type	Recyclable	Liability
Oil	Used Oil	Solid	Yes	Low
Paints	Used/Spent Paints	Solid or Hazardous	Yes	Low
Solvent	Unused/Spent Solvent	Hazardous	Yes	Low
Pesticides	Excess Pesticides	Hazardous	Yes	Low
Cleaners	Used/Spent Cleaners	Solid or Hazardous	No	Low

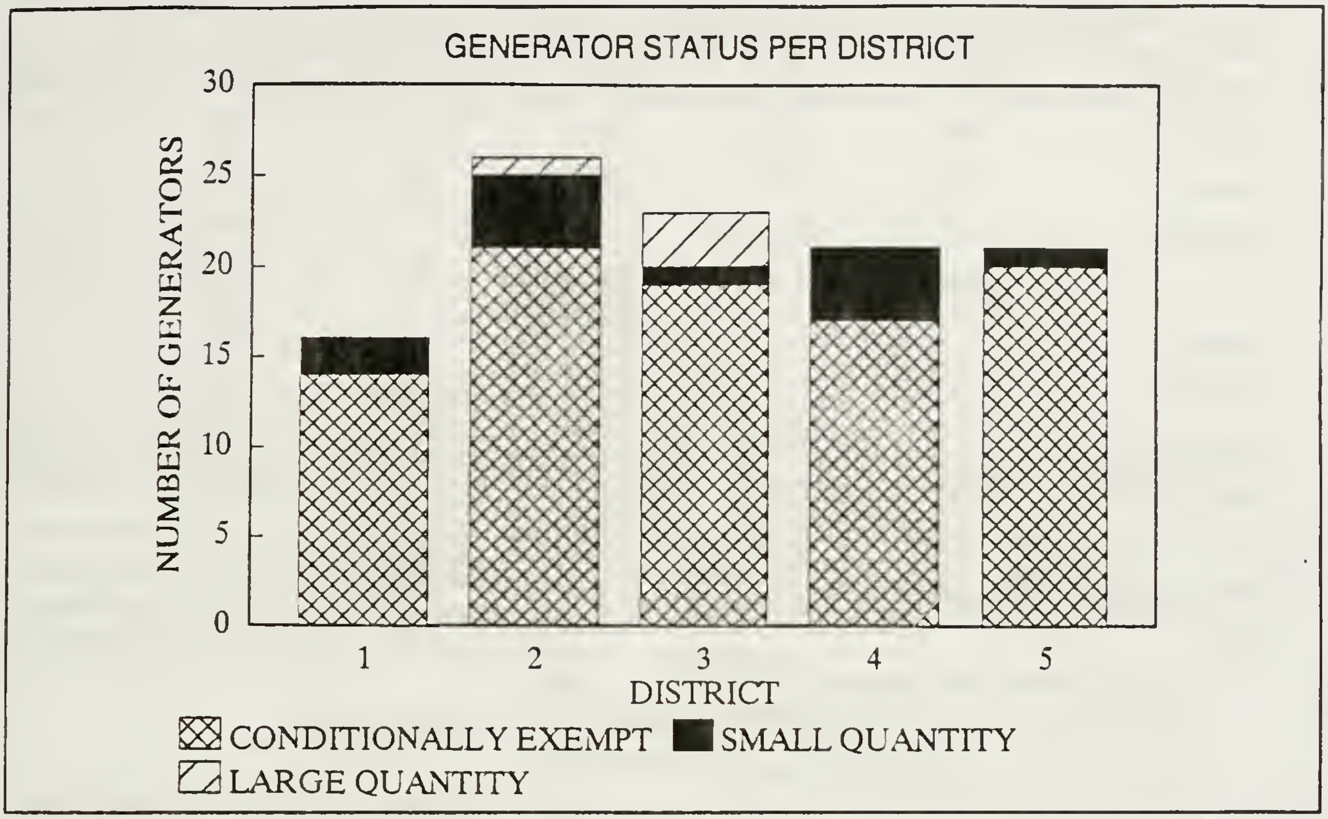


Figure 3-1. Of the 134 sites that reported hazardous waste generation, 68% are conditionally exempt small quantity generators.

Waste pesticides and herbicides comprise the smallest contribution (approximately 55 gallons and 51 gallons, respectively). District 2 reported the largest quantity of waste that needs to be disposed of (approximately 21,100 gallons), while District 5 reported the smallest amount (approximately 3,200 gallons).

Of the 287 tanks reported by MDT auditors, Figure 3-3 shows the number of USTs that currently lack a leak detection system. (As discussed further in Section 5.1.1, MDHES' data base indicates that 299 UST systems are currently registered. Therefore, it appears that MDT auditors reported most, but not all UST systems in operation). All tanks that were installed prior to 1980, or tanks for which the age is unknown, were required to meet the leak detection requirements by December 1992. Tanks installed between 1980 and 1988 must meet the requirements by December 1993. All tanks installed after 1988 are required to have leak detection, corrosion protection, and overfill spill prevention at installation. About 168 USTs on MDT sites state-wide lack leak detection systems, according to information provided by the auditors. District 1 reported the largest number of USTs lacking leak detection systems (46), while District 3 has the smallest number (17). Forty-one percent (41%) of the UST systems state-wide are currently meeting the leak detection requirements.

3.3 CERCLA/CECRA Compliance

As discussed briefly in Section 1.0, both CERCLA and CECRA are applicable to MDT's activities. CERCLA originally dealt only with uncontrolled spills and releases, but was amended by the Superfund Amendments and Reauthorization Act (SARA) to include hazardous material and spill reporting requirements. The discussion of CERCLA in this section will be limited to these reporting requirements.

Most, if not all, of MDT's sites that have been contaminated by releases of hazardous substances will not qualify for cleanup under CERCLA; in order for a site to be placed on the National Priorities List (NPL), substantial contamination would need to be present. In these instances, the state's CECRA program would have the authority to address cleanup actions at the site. Unlike CERCLA, the CECRA program considers petroleum products to be hazardous substances. Therefore, sites contaminated by releases of paints and solvents, as well as petroleum products, present a potential liability to the Department under the CECRA program.

The CERCLA/CECRA compliance information presented in this section was obtained from the abbreviated audit

Table 3-9. Conservatively, at least 46,500 gallons of waste will need to be disposed of at an estimated cost of $500,000.

Waste Type	District 1	District 2	District 3	District 4	District 5	**Total Gallons**
Paint	1,062	12,612	2,102	1,331	957	**18,064**
Solvent	0	220	990	165	165	**1,540**
Unknown	2,277	4,125	3	127	495	**7,027**
Oil	6,875	3,795	2,750	655	1,320	**15,395**
Pesticide	0	0	0	0	55	**55**
Herbicide	35	0	16	0	0	**51**
Miscellaneous	660	350	453	2,585	165	**4,213**
Total Gallons	**10,909**	**21,102**	**6,314**	**4,863**	**3,157**	**46,345**

checklists and is presented by district. The CERCLA compliance issues applicable to MDT facilities include:

- Past and current waste management practices that may present liability to the Department
- Required emergency response reporting
- Hazardous materials reporting.

Statistics on past and current waste management practices that may present liability to the Department are shown in Figure 3-4. Four waste management practices of particular environmental concern were selected from those reported in the audits: onsite dumping, onsite burning, spills and sumps. Of the 263 sites evaluated, 95 sites reported some form of onsite dumping. Onsite dumping within the grounds of the facility typically involved sump sludge, waste oil, or waste paint. Thirty-seven (37) sites state-wide reported onsite burning of waste (typically waste oil, trash, or creosote posts). One-hundred two (102) spills were reported state-wide. The type of spills ranged from vandals releasing large amounts of waste oil to small spills near storage tanks. One-hundred and nine (109) sites reported the use of sumps at their facilities. Because few sumps have been re-routed to sanitary sewer systems, they may be releasing hazardous substances to the environment. Additionally, sump sludge is commonly dumped in the yard of the facility once it's removed from the sump.

Figure 3-5 illustrates the sites that are lacking awareness in hazardous material reporting requirements. One-hundred and twenty seven (127) sites state-wide reported that their facility was unaware of State Emergency Response Commission (SERC) and Local Emergency Planning Commission (LEPC) notification requirements for storage of hazardous materials. Thirty-nine (39) sites state-wide reported that their facility was unaware of National Response Center (NRC) and State and Local Emergency Commissions notification requirements for spills.

3.4 TSCA Compliance

TSCA was developed to test new chemicals for their potential to adversely affect human health or the environment. Polychlorinated biphenyls (PCBs) are also regulated under TSCA. The TSCA compliance information presented in this section was obtained from the audit checklists and is presented by district.

Figure 3-6 presents the number of PCB items on MDT property that may require sampling and/or disposal. Approximately 122 transformers and 11 generators were reported at the 263 sites evaluated state-wide. However, it appears that almost all of the transformers are owned by utility companies that may perform the sampling and/or disposal. Only 1 transformer, which is located at the Dell Airport (Butte Division of District 2) was reported to be owned by MDT. District 4 had the largest number of PCB items (60 transformers) and District 2 had the fewest (2 transformers and 2 generators). No sites reported disposal of PCB items at their facilities.

3.5 FIFRA Compliance

FIFRA provides the primary statutory basis for the regulation of pesticides, including pesticide management, storage and disposal. The FIFRA compliance information presented in this section was also obtained from MDT's auditors and is presented by district. The quantities of unlabeled pesticides and expired pesticides is shown in Figure 3-7 and discussed further below.

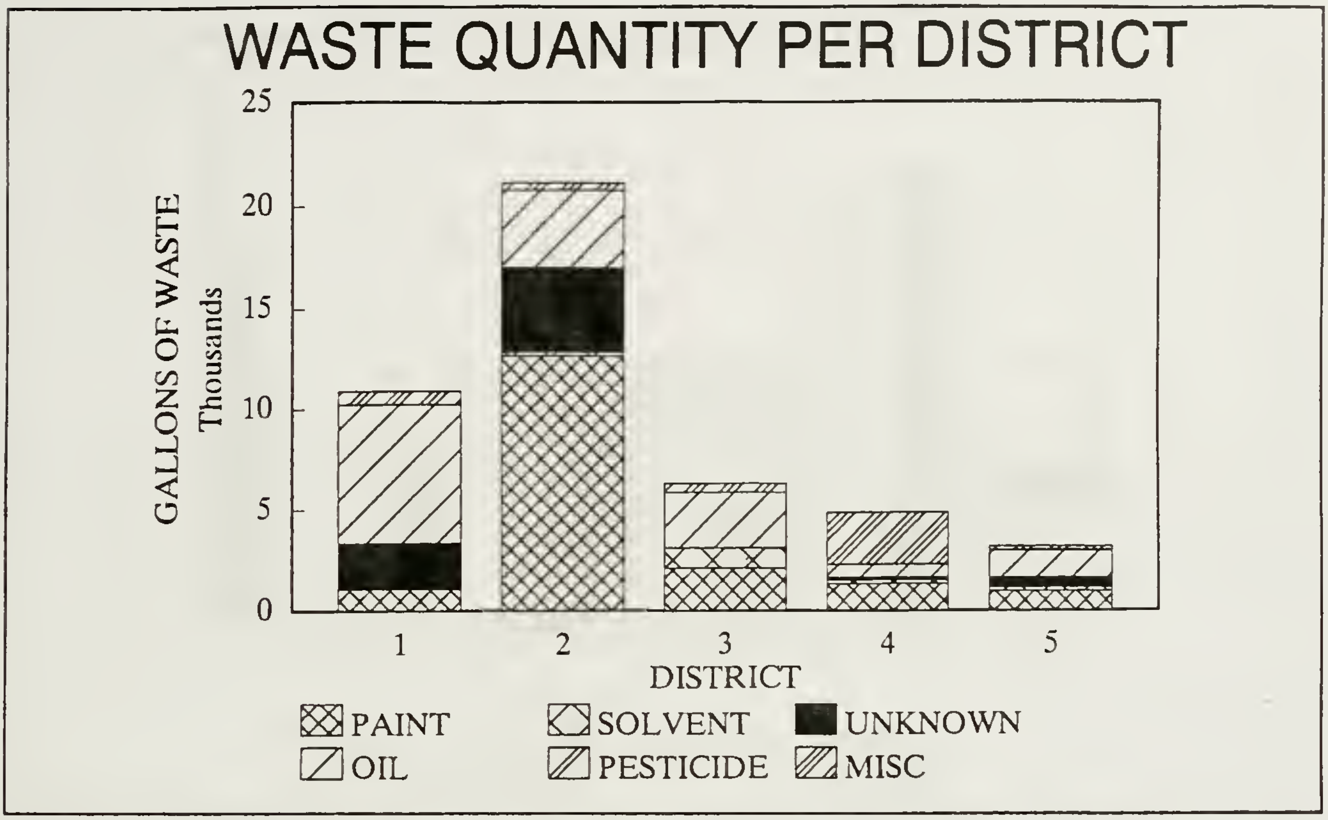


Figure 3-2. Conservatively, 46,500 gallons of potentially hazardous waste exist at MDT facilities statewide.

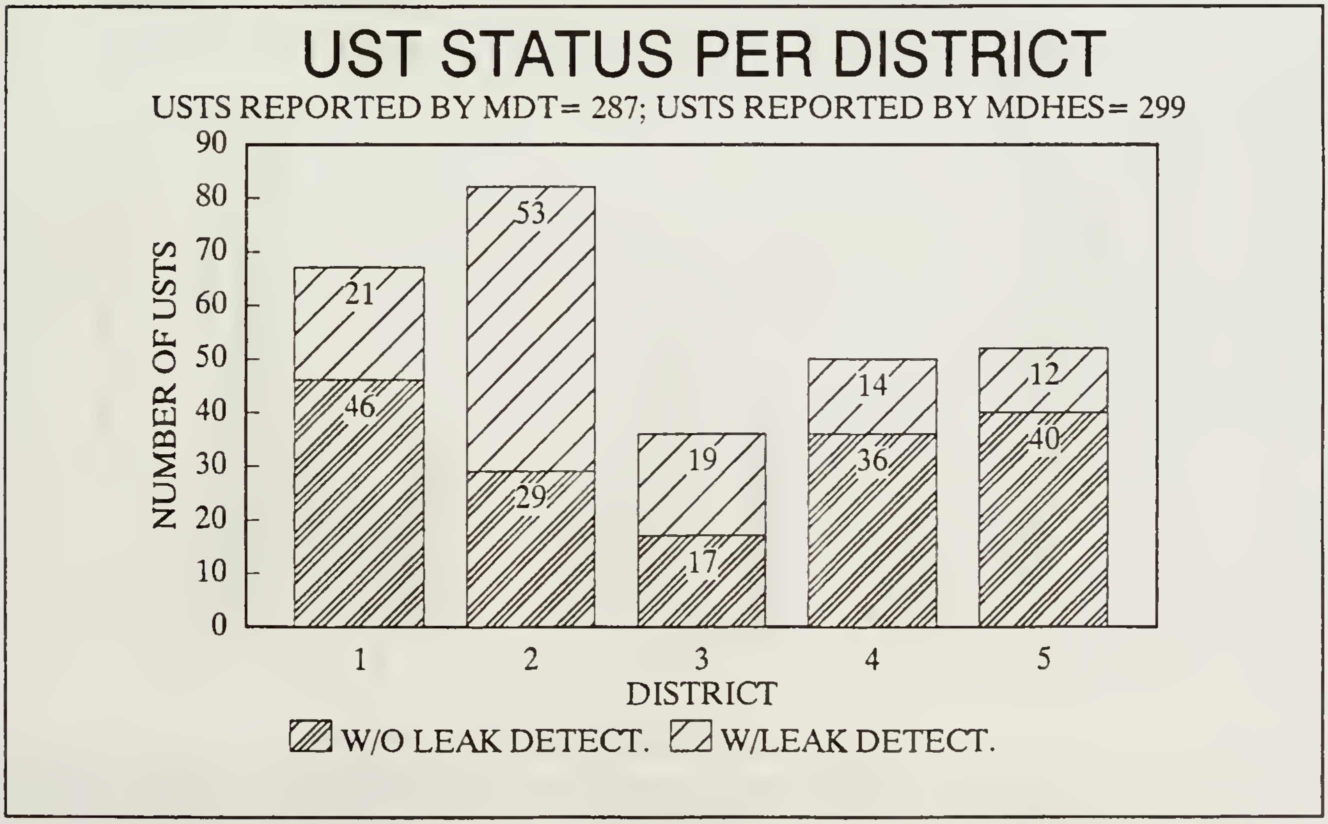


Figure 3-3. Fifty-nine percent (59%) of reported USTs statewide do not currently meet the leak detection requirements.

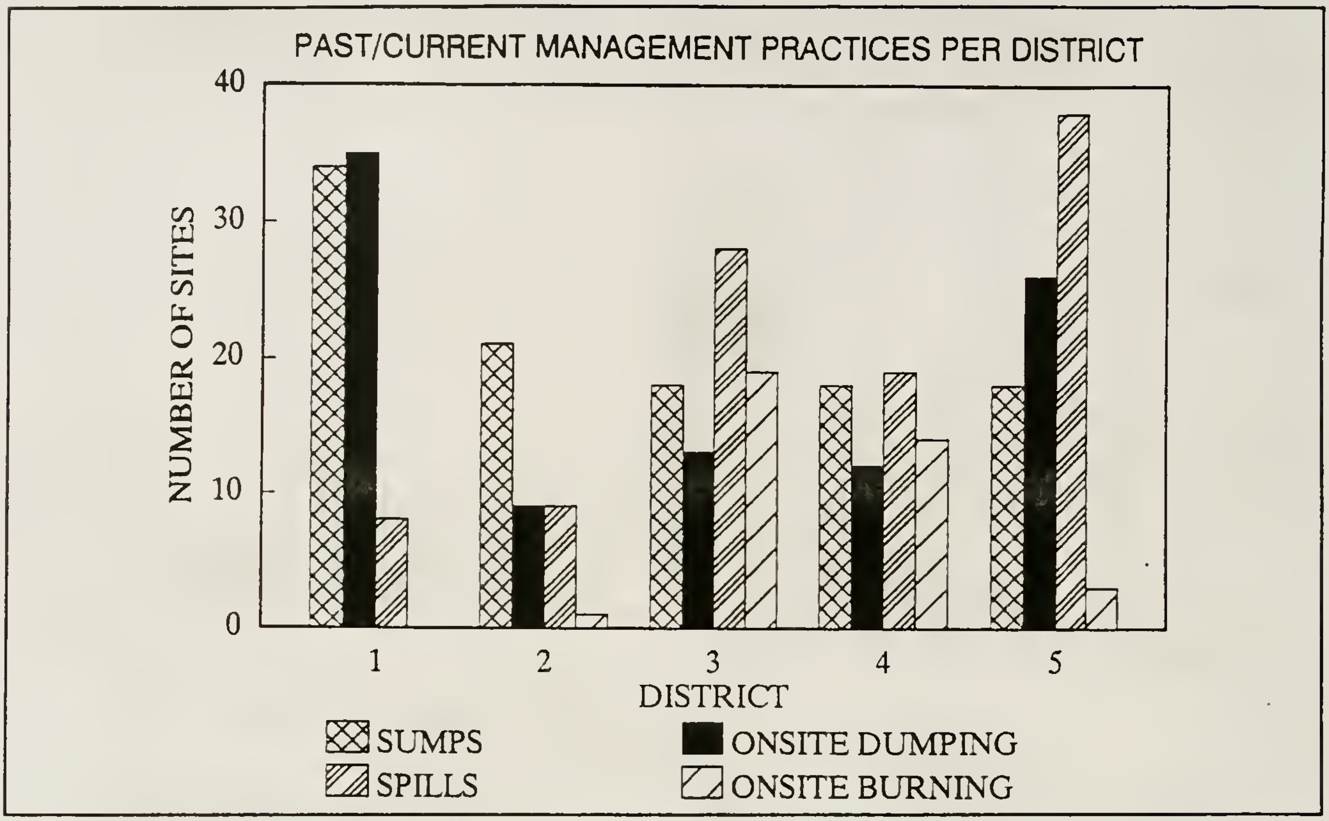


Figure 3-4. Of the 263 audited sites, 42% and 36% reported sumps and onsite dumping, respectively.

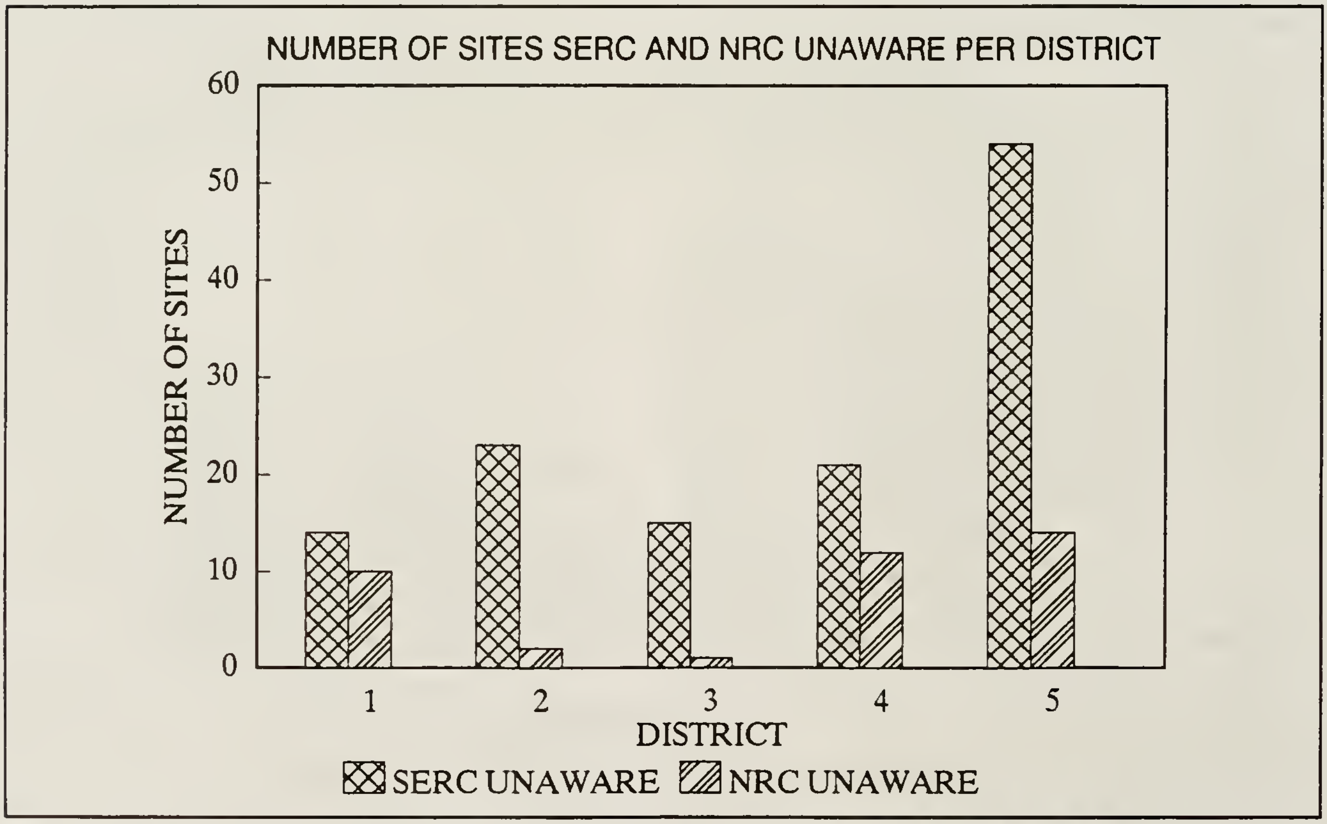


Figure 3-5. Forty-nine percent (49%) of the audited MDT sites reported that their facility was unaware of hazardous materials reporting requirements.

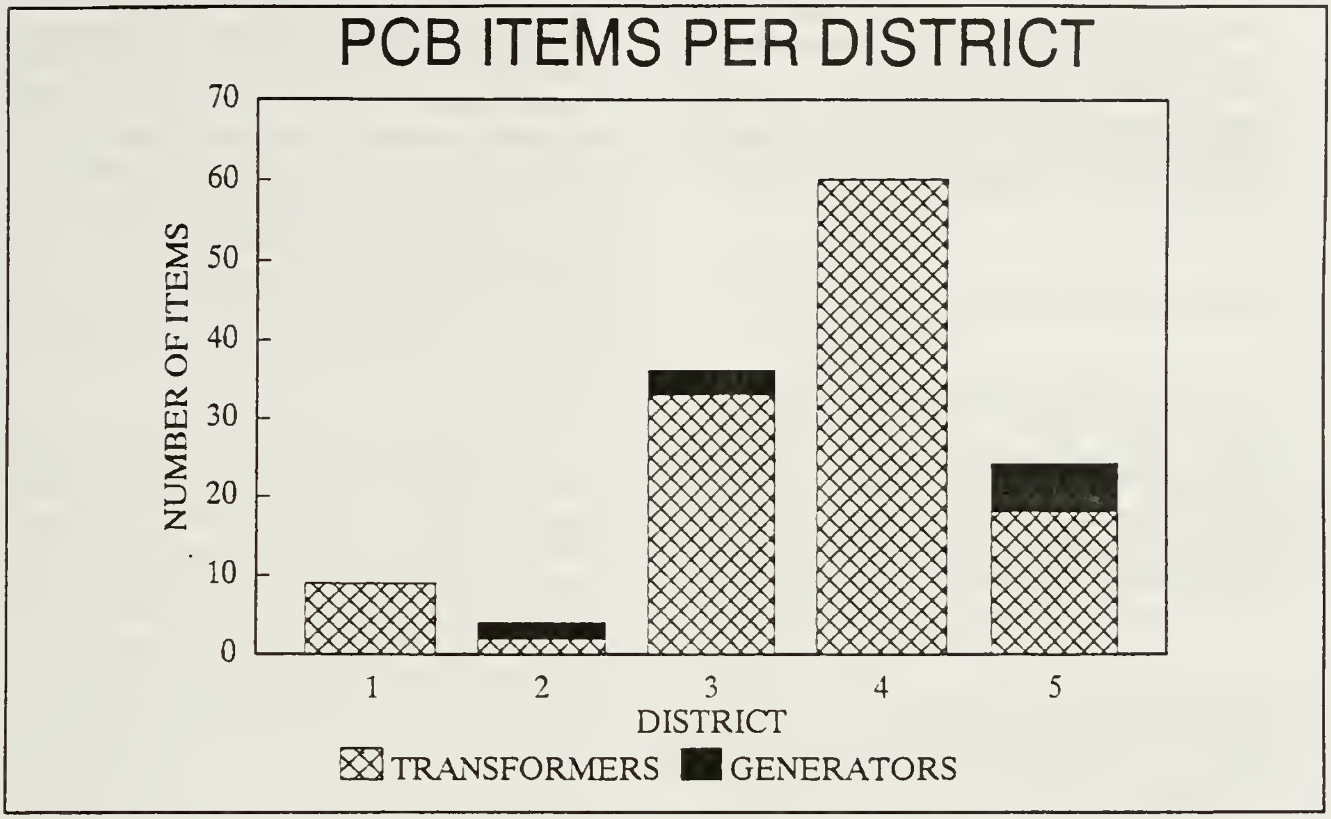


Figure 3-6. One hundred and twenty two (122) transformers and 11 generators were reported at MDT facilities.

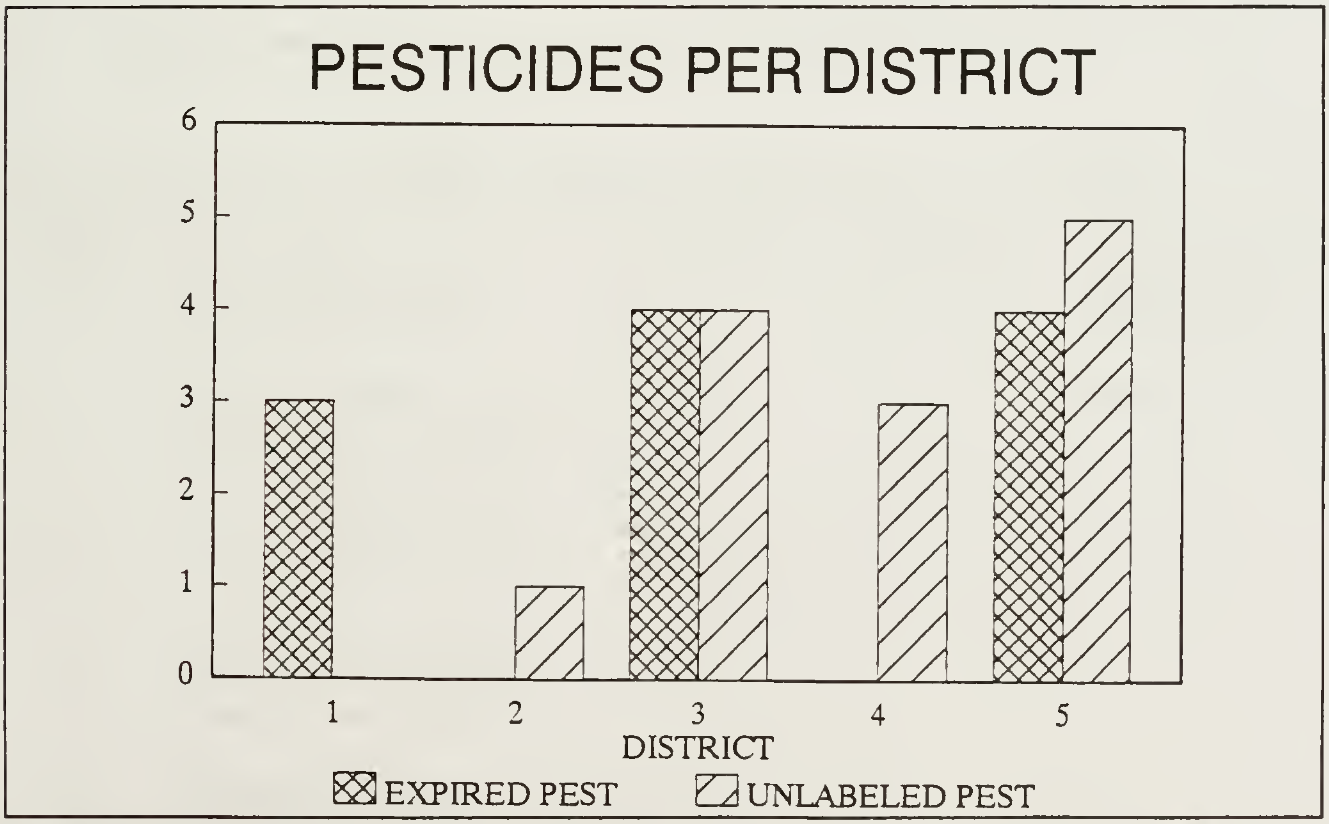


Figure 3-7. Eleven (11) sites reported expired pesticides, and 13 sites reported unlabeled pesticides at their facilities.

One-hundred and twenty two (122) sites state-wide reported having licensed pesticide applicators and 90 sites reported having licensed pesticide operators. Eleven (11) sites reported expired pesticides and 13 sites reported unlabeled pesticides. Only 1 site (the Billings Complex Maintenance Shed in the Billings Division of District 5) reported having an appropriate pesticide storage area. However, no verification documents were available for confirmation. A small quantity (< 5 gallons) of the expired pesticide, 2,4,5T, was reported at one site (the Columbus Maintenance Shop in the Billings Division of District 5).

4.0 MSE VERIFICATION AUDITS

Verification audits performed by MSE indicate that MDT's assessments are generally accurate and thorough. By assimilating information from both the assessments and the verification audits, MSE has developed a sound database and a good picture of the MDT's environmental compliance status.

In the original contract and Scope of Work, it was envisioned that the MDT audit team would conduct environmental compliance audits at all MDT facilities using the very detailed checklists provided in Volume 2 of the training manual. Based upon input MSE received during the training, it became apparent that the detailed audit checklists were too technical given the auditors limited exposure to the environmental regulations. Therefore, MSE developed the abbreviated audit checklist which was designed to gather more general information from which MSE could gauge MDT's environmental compliance status.

Because the focus of the initial MDT audits shifted from a very detailed to a more general assessment, the MSE verification audits shifted in response. The verification audits MSE conducted had four objectives:

- Verify the information provided in MDT's initial audit reports
- Assess environmental compliance in more detail using the detailed audit checklists
- Obtain a better understanding of work practices and procedures so that the reasons for non-compliance with environmental regulations can be understood
- Identify noteworthy practices that can benefit all MDT facilities.

After reviewing the audit checklists completed by MDT auditors, MSE performed verification audits at 17 MDT facilities. Audits were conducted in all five districts to ensure that a good cross section of MDT's facilities were evaluated in terms of function and geographic location. Table 4-1 and Figure 2-2 identify those locations where verification audits were conducted. Facilities and sites audited include division complexes, section sites, airports, and GVW stations.

In comparing MDT's abbreviated audit checklists to MSE's detailed audit checklists, MSE hoped to gain some insight into the accuracy, completeness, and overall usefulness of the database generated from MDT's assessments.

Comparison of data gathered indicates that MDT's audit checklists are generally accurate. However, some of the initial reports lack detail. Examples of detail missing from some reports include:

Table 4-1. MSE conducted verification audits at 17 facilities to verify the information provided in the MDT's abbreviated audit checklists and to identify any unique geographic issues or concerns.

District	Division Office	Section Site	GVW Station	Airport
1	Missoula Maintenance Shop	Evaro	Lolo	Rock Creek
2	Butte Maintenance Shop Helena Headquarters Main Complex	Boulder	Rocker	Helena
3	Great Falls Maintenance Shop	Sun River Emerson Junction	—	—
4	Wolf Point Maintenance Shop Glendive Maintenance Shop	Terry	—	—
5	Billings Maintenance Shop	Hysham	—	—

- A description of wastes that may be generated on an intermittent basis, but were not present at the time the assessments were conducted
- A comprehensive identification of wastes generated and waste management/disposal practices
- A comprehensive identification of hazardous materials stored
- Identification of wastes that probably would have been disposed of through a shop's sump.

It's apparent that some of the auditors were confused about the difference between products and wastes. Also, some indicated they were not sure how to determine if a waste is a solid waste or a hazardous waste. Review of the abbreviated audit checklists also shows that some auditors consistently provided more detail than others. This result was to be expected. Some auditors may have had a greater interest in performing the assessments or, perhaps, were able to spend more time conducting the assessments and filling out their reports.

Because the checklists are generally accurate and many of them provide very detailed information, MSE was able to obtain a fairly clear picture of MDT's operations. After carrying out the verification audits, MSE was able to fill in details where needed and discern similarities and differences in procedures and/or sites across the State. By assimilating information from both the assessments and the verification audits, MSE has developed a sound database and a good picture of MDT's environmental compliance status.

5.0 MSE AUDIT VERIFICATION FINDINGS

In general, MSE found that employees are sensitive and personally committed to environmental protection, but generally lack direction and understanding of regulatory requirements. Based on interviews with a number of MDT employees, one could generalize that materials and waste management practices have improved in recent years.

This section summarizes MSE's observations and findings during the verification audits regarding management of hazardous materials and wastes at MDT facilities. A "finding" is defined as any condition or work practice that, in the judgement of the auditor, may not satisfy applicable environmental regulations. The status of MDT's compliance with RCRA, CERCLA, TSCA, and FIFRA is discussed in terms of materials management, waste management, and recordkeeping and reporting requirements. Findings of non-compliance with specific regulations are noted, MSE's observations that support the findings are discussed, and noteworthy practices that were observed are identified.

During the verification audits, MSE auditors attempted to learn not only how hazardous materials and wastes are managed, but why they are managed as they are, and how practices have changed over the years. To a large extent, MSE's auditors recorded how hazardous materials and wastes are managed on detailed checklists. Some observations on how and why materials and wastes are managed the way they are do not "fit" neatly on a checklist, so they are discussed in this section.

Most of the observations presented below were noted at more than one site. Of course, work practices vary somewhat across the State, so none of the observations necessarily apply to every facility. In general, MSE found that employees are sensitive and personally committed to environmental protection, but generally lack direction and understanding of regulatory requirements. Based on interviews with a number of MDT employees, one could generalize that materials and waste management practices have improved in recent years.

5.1 Materials Management

This section focuses on the requirements governing management of hazardous materials and summarizes waste minimization and pollution prevention practices that were identified during the verification audits. PCBs were not present at any of the facilities audited by MSE, so TSCA is not addressed in this section. Issues related to historical management of materials are discussed in Section 5.2 under CERCLA.

5.1.1 RCRA. *Not all facilities appear to be familiar with the inventory control, recordkeeping, reporting, and the leak detection requirements for underground storage tank systems.*

The major emphasis of the RCRA program is the regulation of generated hazardous wastes. However, RCRA also addresses the management of hazardous substances and petroleum products in underground storage tanks (USTs). By definition, an UST system is one that contains at least 10% of its volume beneath the ground surface. All existing UST systems that were installed prior to 1980, or any tanks for which the date of installation is unknown, were required to meet leak detection requirements by December, 1992 (ARM 16.45.202). All UST systems must be upgraded to meet the corrosion protection and spill/overfill prevention requirements by December 1998 or be decommissioned. As discussed in section 3.2, 59% of the USTs currently in operation are not in compliance with the leak detection requirements.

According to the database developed by the MDHES UST Program, 299 MDT tanks are currently registered with MDHES. All tanks that are currently in service or have been closed must be registered with MDHES (ARM 16.45.901-902). The number of tanks identified by the auditors and documented in the audit checklists is 168. Therefore, it appears that either incomplete or inaccurate information regarding the number of UST systems currently in place was provided in the checklists.

During the verification audits, MSE spoke with Bill Zucconi, Executive Staff Assistant to the Director's Office, concerning upgrades and closures planned for existing UST systems. He indicated that MDT has instituted an UST program which is committed to removing the majority of UST systems currently in place and replacing them with above ground storage tanks. At the time this report was prepared, approximately 110 UST systems have been closed. Provided program funding continues as expected, approximately 50 more UST systems will be closed by July, 1993. The remainder of the UST systems are scheduled to be closed

by 1996, before the December 1998 deadline for installation of corrosion protection and spill/overfill prevention requirements becomes effective. UST systems will only remain at major installations, and based upon discussions with the MDT UST program, they are aware that these tanks will need to be upgraded to meet all corrosion protection and spill/overfill prevention requirements. Until all tanks planned for closure are removed, however, they must meet the leak detection requirements of ARM 16.45.202.

MSE also spoke with the MDHES UST Program to obtain further information concerning MDT's compliance with UST requirements. MDHES's database, which identifies the number of UST systems registered, was also reviewed (Appendix B). MDHES indicated that not all facilities appear to be familiar with the inventory control, recordkeeping and reporting requirements, and the leak detection methods allowable by law (ARM 16.45.305 and 401). MSE's review of the MDHES database revealed the following:

- 299 UST systems are currently registered with MDHES
- Of the 168 UST systems that were required to have leak detection systems in place by December 1992, 64% did not meet the requirement
- Of the 114 UST systems that will require leak detection systems by December 1993, none currently have such a system in place.
- Of the 88 UST systems that are four years old or less, 27% currently do not meet the leak detection requirements.

5.1.2 FIFRA. *None of the facilities audited had storage areas for pesticides that met all applicable EPA recommendations.*

In accordance with 40 CFR 165.10, temporary storage applies to those pesticides that are stored for the period immediately prior to, and in quantities required for, a single application. It is recommended that pesticides stored in greater quantities or for longer periods of time comply with specific standards for storage facilities. These long-term storage recommendations could be implemented at all of the MDT facilities

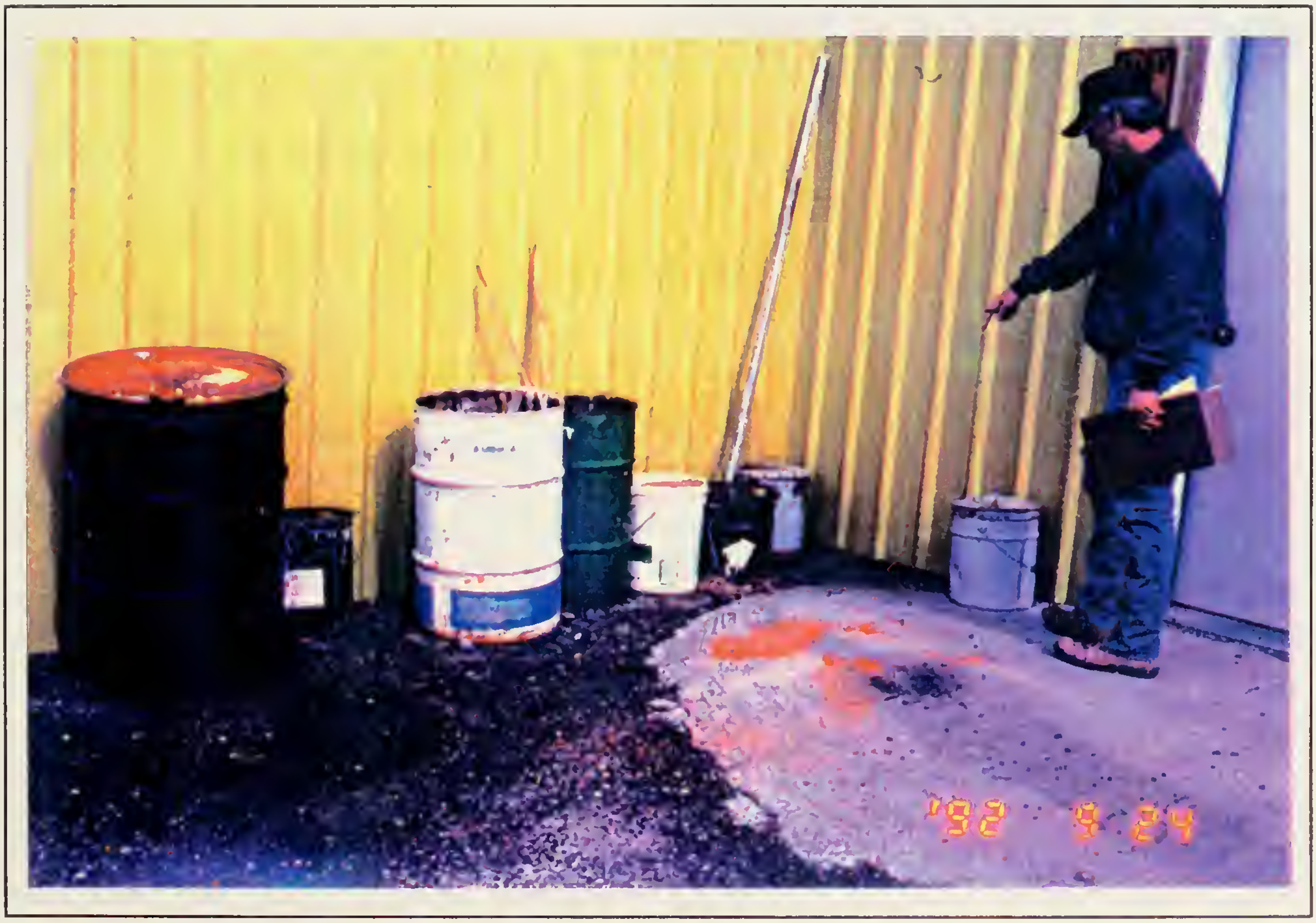


Figure 5-1. Pesticides are not always stored as required to minimize the potential for their release to the environment.

audited; none of those facilities were implementing all the recommendations as discussed further below.

All storage sites should be located in a geologic area where flooding is unlikely and where any contaminated stormwater runoff or percolation will not impact any nearby water system. Drainage from the site should also be contained and monitored. All but one of the sites MSE audited met these general recommendations. One site was located below the 100 year floodplain elevation in an area that has been flooded in the recent past.

It is also suggested that pesticides to be stored in facilities or structures where ventilation, fire protection, and security are provided and floor drains are absent. Most of the facilities audited would meet these general recommendations. However, few facilities met the following:

- Doors and gates to the facility should always be locked
- Pesticide identification and warning signs should be placed in rooms or buildings
- Containers should be stored with the labels clearly visible
- Damaged containers should be transferred to good containers and properly labeled
- All containers should be stored off the ground
- A complete inventory of pesticides indicating number and type should be available
- Containers should be checked regularly for corrosion and leaks
- Mechanisms should be in place to prevent access of unauthorized personnel
- Local authorities should be notified in writing of the hazards these pesticides might present in case of a fire
- Monitoring systems should be available to monitor the environment around a storage facility.

Pesticide containers are not consistently stored as suggested on the label (40 CFR 165.10). Many pesticides observed during the verification audits were stored in non-heated buildings and were stacked on top of machinery or other objects in an unstable position where they could fall and spill. Containers are not inspected regularly for corrosion and leaks, and several corroded drums were observed during the verification audits.

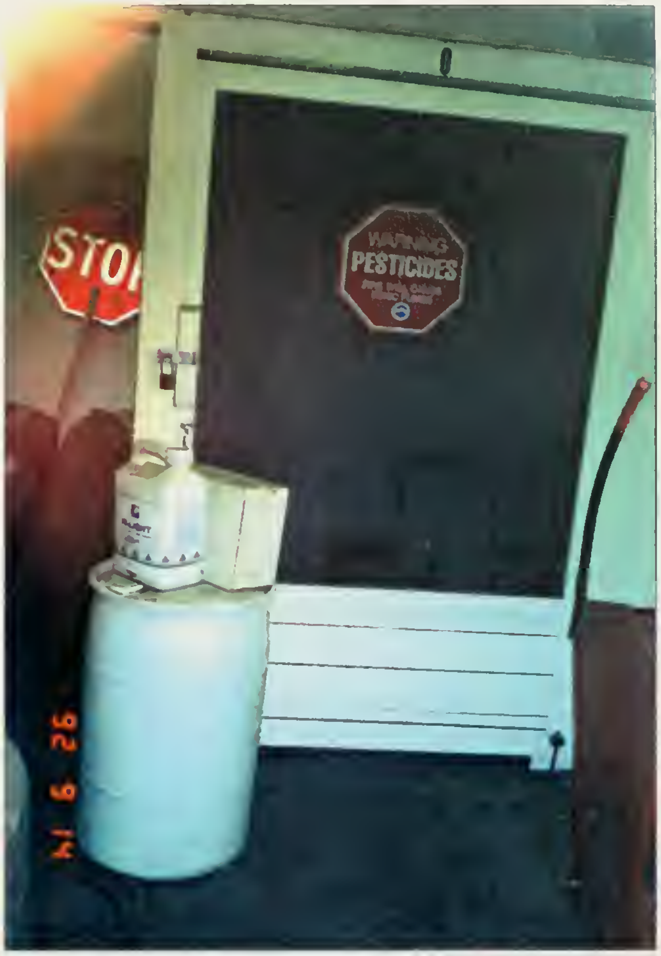


Figure 5-2. Areas where pesticides are stored meet some, but not all, of the requirements for pesticide storage facilities.

It should be noted that the provisions found in 40 CFR 165 are recommendations, not enforceable requirements. The actual legal requirements for proper storage and disposal of pesticides are contained on pesticide labels. However, it would be a best management practice to evaluate the quantity and toxicity of pesticides managed at the site and implement those recommendations that may be pertinent.

It should also be noted that major revisions to 40 CFR 165 are expected in Summer, 1993. Many of these recommendations may become requirements and additional regulations concerning containment and mixing/loading of bulk pesticides are anticipated.

5.1.3 Waste Minimization and Pollution Prevention. ***MDT's historic lack of attention to minimizing the quantity and toxicity of wastes generated from maintenance activities currently presents a potential financial, human health, and environmental liability to the Department.***

As stated in the Pollution Prevention Act of 1990, Congress has declared, as a national policy, that:

> *Pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner, whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.*

Section 1003 of RCRA also mandates a national policy of waste minimization and pollution prevention:

> *The Congress hereby declares it to be the national policy of the United States that, wherever feasible, the generation of hazardous waste is to be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated should be treated, stored, or disposed of so as to minimize the present and future threat to human health and the environment.*

The Department does not have an official Waste Minimization and Pollution Prevention (WMPP) Program or Plan in place which emphasizes the importance of source reduction, waste minimization, and recycling, nor has an official policy been finalized which communicates MDT's commitment to achieving these objectives. A formal training program which instructs employees on the importance of waste minimization, source reduction and recycling, and offers suggestions on how this might be accomplished for day-to-day activities, has not been instituted. Also, there is not a formal program in place to evaluate products and processes where waste minimization and pollution prevention opportunities exist.

In the Department's decision-making process, environmental benefits and long-term cost savings associated with improved waste management practices are not always given the same priority as short-term financial considerations. For instance, MSE learned during the verification audit that silver is not recovered from photo processing chemicals although the silver recovery potential is fairly high. It was determined that the initial investment of $2,000 for a silver recovery unit was not a justifiable expenditure since any money realized from recycling would go to the State general fund and would not be returned directly to the Department. Employees in the photography lab are very interested in the benefits of waste minimization; as a result, they have invested their own resources, both time and money, in acquiring a less sophisticated unit in an attempt to recover at least small quantities of silver. Currently, photo processing chemicals and the majority of silver are discharged to the city sewer.

There is an employee incentive program in-place to encourage suggestions that may improve work practices and/or save money for the Department. However, employees we spoke with voiced a concern that the program was not truly effective and that the incentive committee and management is not always committed to following up on worthwhile suggestions presented by employees.

MDT's lack of attention in recent years to minimizing the quantity and toxicity of wastes generated from maintenance activities currently presents a potential financial, human health, and environmental liability to the Department. Based upon the information provided in MDT's initial audit reports, at least 46,000 gallons of waste will need to be disposed of. The cost for disposal alone may well exceed $500,000. This does not include other associated costs such as MDT labor needed to properly package the waste, DOT approved containers for transporting the waste, and the actual transportation costs.

Purchasing

No formal program exists to monitor purchases of hazardous materials and chemicals. When products are purchased, the MSDS is not always reviewed. The responsibility for determining what products need to be purchased falls primarily with employees and the Maintenance Chiefs. There is no formal oversight program in place to ensure that unnecessary or duplicative products are not purchased. Also, there is no mechanism in place to prevent the purchase of a hazardous material when a non-hazardous substitute is available and adequate.

Inventory is tracked and kept up-to-date through a catalog and a computer system. This system is capable of identifying excess products throughout the State that could be acquired and used by a particular facility. However, there are no procedures in place which require an employee to make sure available or excess inventory does not already exist at that facility or another location prior to purchasing a product.

Most of the employees we spoke with indicated they were not sure what should be done with excess chemicals or how they should be disposed of. As a result, excess products are often stored beyond their shelf-life or are disposed of based upon past practices at the facility. All of the employees we spoke with were interested and concerned about proper disposition of these materials, but feel guidance and direction is not provided from the Department.

Noteworthy Practices

While no formal WMPP programs have been instituted within the Department, several waste minimization practices are being implemented, due primarily to the innovative efforts of individual employees. Employees are more aware of the benefits of waste minimization and pollution prevention than they were several years ago, but most of the employees we spoke with identified the need for further education and direction. Following are examples of noteworthy practices that are taking place at some of the facilities to minimize generation of wastes:

- Employees take the opportunity to pass on valuable WMPP information to others during monthly section meetings, yearly safety meetings, shop superintendent meetings, striping seminars, etc.
- The paint and solvent mixture from cleaning out striping trucks and nozzles is reinjected back into the truck for reuse
- The diesel and tar pot mixture from cleaning out tar pots is reinjected back into the tar pots to prevent waste generation
- Many facilities are using recycled and recyclable solvents
- Some facilities are recycling used oil filters and anti-freeze
- Asphalt cores used in materials testing procedures are kept and used for filling and patching roadways
- Efforts are underway to purchase non-toxic paints (low lead/chromium content) to minimize the potential for generating a hazardous waste
- Spent yellow and white paints are segregated to minimize the quantity of waste paint that will need to be disposed of as a hazardous waste
- Water-based cleaners are being used instead of traditional solvents for cleaning where practicable
- Oil filters are drained prior to disposal in the landfill and the used oil is collected and burned for energy recovery
- Excess or damaged, treated guardrail posts are used for guardrail blocks or other uses to minimize the quantity of treated wood that needs to be disposed of
- Metal shavings generated in the machine shops are collected and recycled with the scrap metal
- The quantity of inks and solvents used in the sign shop has been dramatically reduced by identifying and using one product that is compatible with many types of sheeting
- Some employees are utilizing the services of the Montana Industrial Waste Exchange, and have been able to find a potential user for a product no longer needed by the facility.

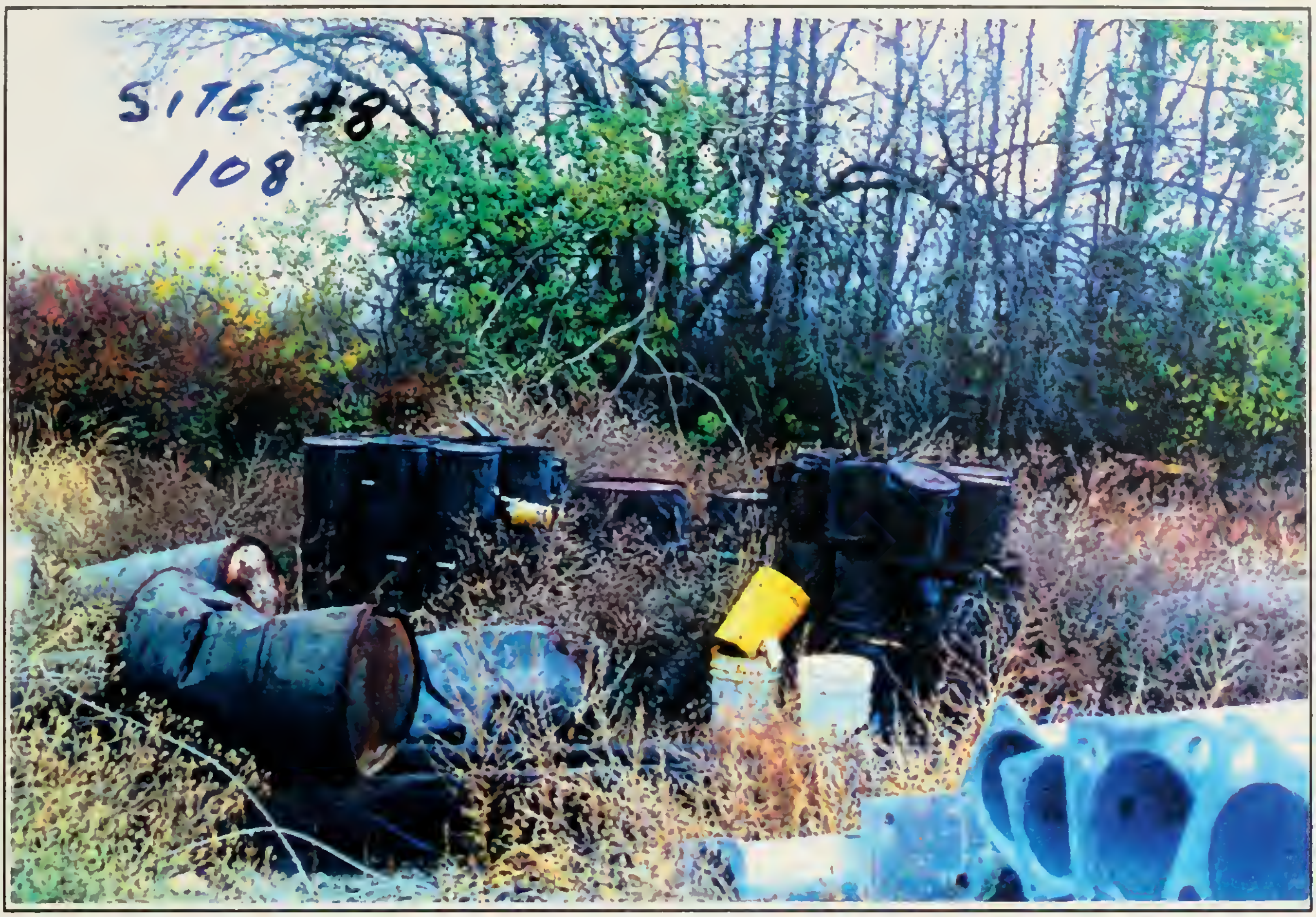
5.2 Waste Management

Observations and findings regarding MDT's waste management practices are discussed in this section. In general, very few of the facilities audited were aware of the requirements for proper management and reporting of hazardous substances under CERCLA, solid and hazardous wastes under RCRA, and pesticides under FIFRA. None of the sites visited had PCBs, so TSCA is not addressed in this section.

5.2.1 RCRA. ***Employees are not familiar with the RCRA process for determining if a waste is a solid waste or a hazardous waste. Very few of the storage requirements for hazardous waste are currently being met.***

A hazardous waste determination is not routinely made on wastes generated by MDT activities as required by ARM 16.44.402. Many employees MSE spoke with were not familiar with or did not understand the RCRA process for determining if a waste is a hazardous waste. Some employees were further confused about the differences between a solid waste and a hazardous waste.

Not all MDT facilities have determined their generator status, and therefore, do not know which RCRA requirements are applicable to their operations (ARM 16.44.402). Coupled with the fact that hazardous waste determinations are not made, MDT cannot be certain that wastes are being disposed of at an "authorized" facility. For instance, conditionally exempt small quantity



SITE #8
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Figure 5-3. Paint wastes have accumulated at many MDT facilities over several years.

generators are allowed to dispose of their wastes at a permitted Class 2 municipal landfill. However, small and large quantity generators are required to dispose of their wastes at a permitted treatment, storage, and disposal (TSD) facility.

Virtually none of the temporary accumulation requirements for containers are currently being met (ARM 16.44.415). Small and large quantity generators are required to dispose of hazardous waste within 90 - 270 days of generating the waste. Many of the waste paints at these facilities have been stored in their present condition for a period of several years. Proper labels identifying the accumulation start date and the contents of the containers are not present.

Employees are not aware of the requirements for proper management and storage of containers holding hazardous wastes (40 CFR Part 265, Subpart I). Several of the waste drums MSE observed were leaking, corroded, and uncovered. As a best management practice, secondary containment is not always provided and drums are not always elevated to allow early detection of a release. At several facilities, existing bermed areas are present which would be ideal for storage of wastes, but these areas are often not utilized. These containment systems may require minor repairs to ensure they are impervious but are otherwise, suitable for storage of wastes. Also, waste containers and the storage areas are not inspected weekly as required. No hazardous waste was being shipped offsite during the verification audits, so MSE was not able to observe MDT's procedures for packaging, marking, placarding, or labeling containers.

Many of the facilities audited by MSE would be considered small or large quantity generators as a result of the waste paints that are currently being stored onsite. As such, these facilities are required to implement a preparedness and prevention program which ensures employees are promptly made aware of releases or spills (ARM 16.44.415(4)(f)). Large quantity generators are further required to have a contingency plan for responding to fires, spills, and explosions (ARM 16.44.415(5)). Several of the facilities audited are currently implementing portions, but not all, of these requirements.

Landfarming of contaminated soils is not conducted in accordance with draft MDHES solid waste rules and guidelines (ARM Title 16, Chapter 14; and, the General Guidelines for Landfarming of Petroleum Contaminated Soils from Multiple Source Sites, and Sump Solids From Vehicle Service Shops and Car Washes). At one facility, contaminated soils are landfarmed regularly in a materials storage yard east of town that is not permitted. MSE did not have access to necessary information (i.e., depth to groundwater, soil type, etc.) during the audit to determine if the landfarm would meet general siting requirements.

Examples of work practices that MSE observed during the verification audits that present liability to MDT include:

- Sludges that are collected from cleaning out sumps are disposed of in landfills, landfarmed, or discarded in the yard without first determining if the sludge is a hazardous waste
- Waste aluminum and enamel paints used on facility buildings are sent to landfills without determining whether they are hazardous

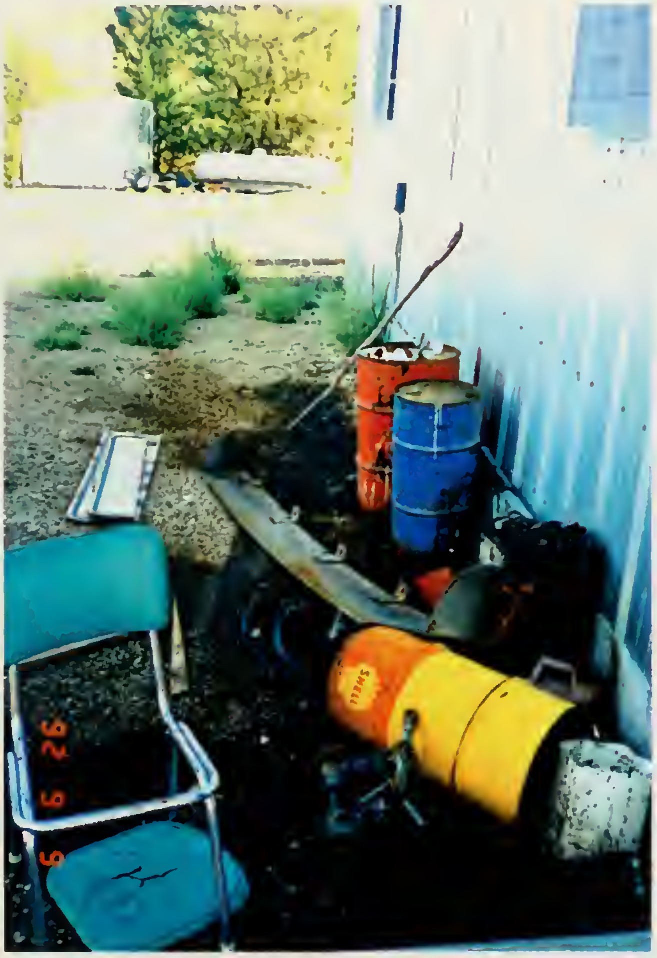

Figure 5-4. Hazardous wastes are not stored in accordance with RCRA requirements, and spill areas are not investigated and cleaned up.

- Hazardous waste paints and solvents are blended with the road mix. Such a practice constitutes illegal disposal of hazardous waste under RCRA, and it carries CERCLA cleanup liabilities as well
- When paint tanks, nurse trucks, and stripers are cleaned out at the end of the season, waste paint is spilled because employees do not have open top drums available. The transfer of these materials to the drums results in substantial spillage of potentially hazardous waste
- Herbicide containers are rinsed with diesel and the diesel is burned in an open barrel. This is a serious violation under RCRA and other environmental statutes and it presents significant health hazards to employees and environmental liability to the Department
- Some employees do not know how to dispose of waste or excess herbicides or do not know of a mechanism in place for disposing of these wastes. Many herbicides are RCRA hazardous wastes once they are "intended for discard"
- Stoddard solvent is thrown out in the yard, particularly at section sites and laboratories, where smaller quantities of the solvent are used. At times, waste solvent is included in the road mix. These practices constitute illegal disposal of hazardous waste under RCRA and can result in significant environmental liabilities
- Some sections take their waste solvents to their division complexes. This is appropriate only as long as these sections are conditionally exempt small quantity generators. Small and large quantity generators must send their hazardous wastes only to approved RCRA TSD facilities and utilize only authorized transporters
- Oil filters are generally drained; however some may exhibit a hazardous characteristic even when empty
- Briquettes used in the marshall tests which contain small quantities of mercury are disposed of in the dumpster without determining whether the briquettes exhibit the hazardous characteristic for mercury.

The following noteworthy practices were observed during the verification audits:

- Some facilities have installed oil separators or have placed oil absorbent pads in their sumps to allow for easy collection of oil which can then be burned for energy recovery or recycled
- Great Falls employees are investigating the potential for recycling waste paint.

5.2.2 CERCLA/CECRA. ***MDT has not identified all potential sites releasing hazardous substances to the environment. Onsite dumping and sumps potentially represent a multimillion-dollar liability to the Department.***

Under Section 103(c) of CERCLA, owners/operators of facilities where hazardous substances have been disposed of must notify EPA of all such sites. This notification was originally required by June 9, 1981; however, hazardous materials disposal sites must still be reported as they are discovered. The proper state and federal authorities to notify are given in Section 2.0, Volume 1 of the training manual.

While EPA was notified about past waste disposal practices at the Helena Fairgrounds Maintenance Facility, MDT has not given notice of waste disposal sites on all of its property. In both the abbreviated audit checklists and the verification audits, numerous sites where potentially hazardous substances were disposed of were identified. In addition, many waste management practices that could lead to CERCLA/CECRA liability were identified.

Examples of poor or inappropriate waste management practices observed during the verification audits include the following. These practices present potential CECRA liability to the Department:

- Road oil tanks are present at a large number of MDT facilities, and most of them have been in use for a long period of time (over ten years). The recurring dripping, spilling, and overfilling

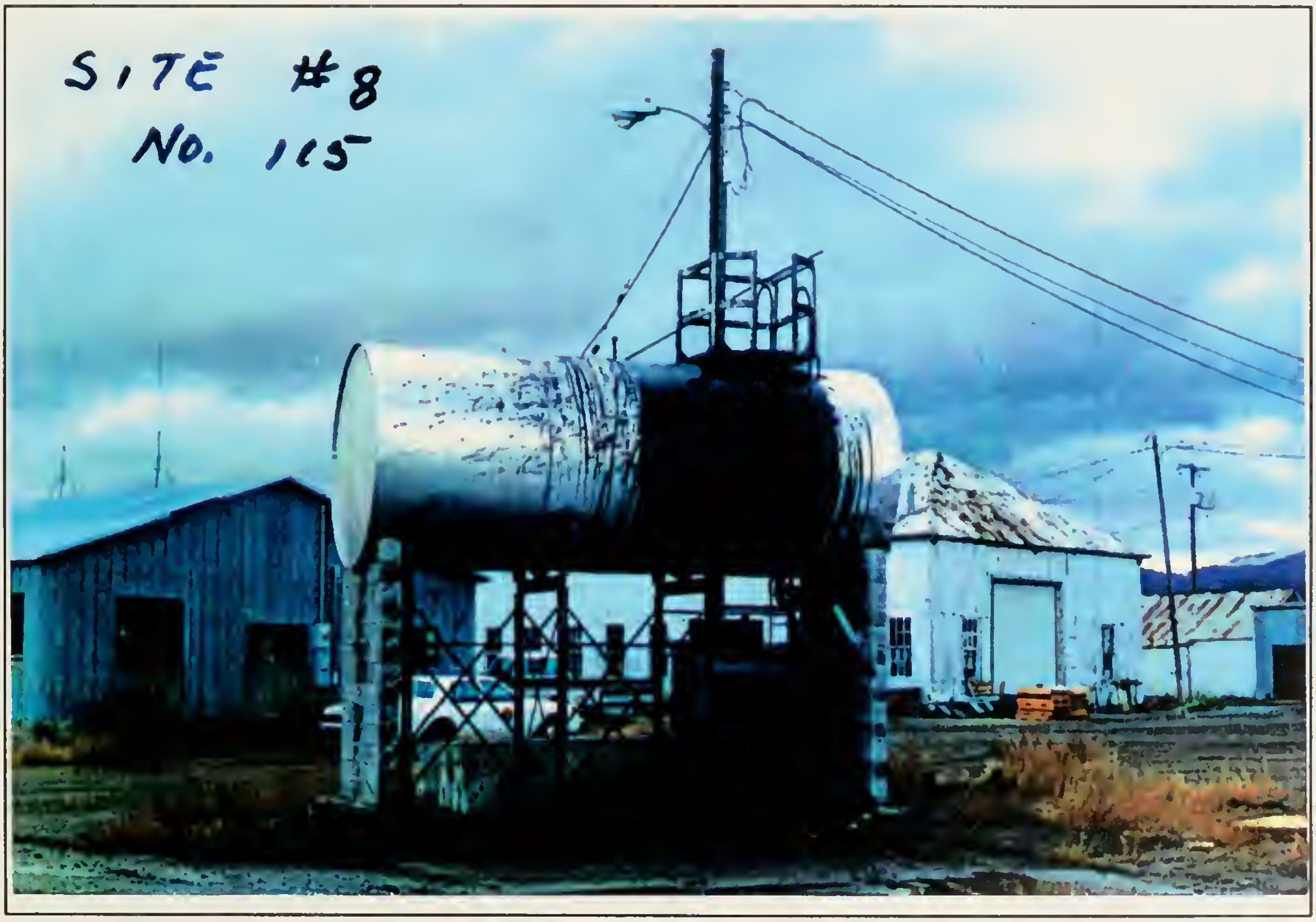
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Figure 5-5. Spills frequently occur around road oil tanks. Contaminated soils must be investigated and properly disposed of.

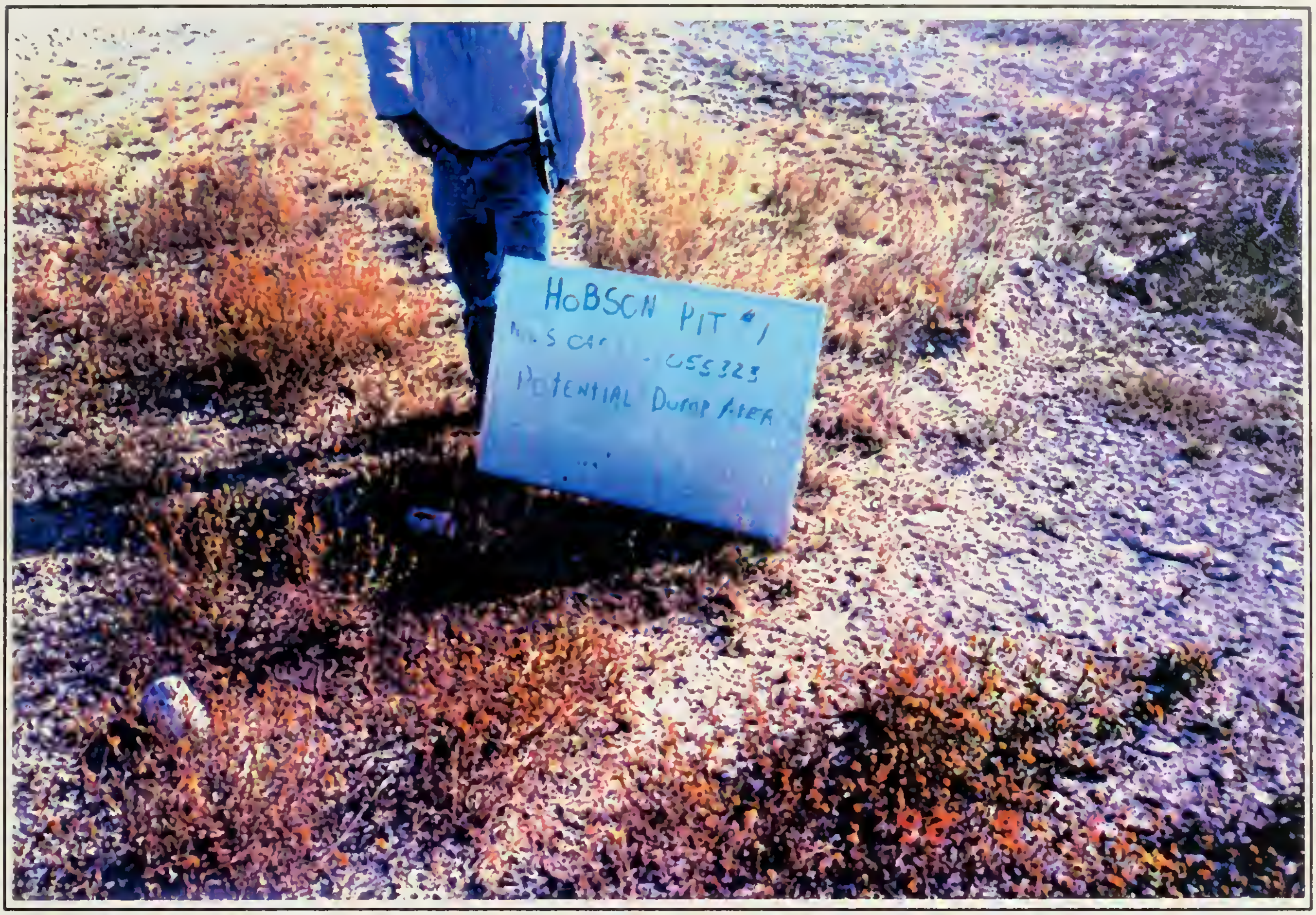

Figure 5-6. Known or suspected buried waste sites were reported at many of the locations audited by the MDT.

of these above-ground tanks has resulted in contaminated soils at the sites. Most of the road oil tanks do not have secondary containment, and where it does exist, it might consist of only an earthen berm. Usually the contaminated soils are not removed and disposed of properly, increasing the potential for further migration of the waste.

- Road mix is still "dumped" on occasion, although not as often as in the past. The mix may be sprayed on the ground (not the road) when testing the nozzles, or when eliminating excess mix after the paving operation. MDT-hired contractors are often responsible for this action.

- At some facilities, stripers are calibrated on mixing floors. This can result in the release of lead to the environment since the mixing floors are not impermeable. Chunks of dried paint were observed on the ground at more than one facility.

- Stoddard solvent is illegally discarded in the yard, particularly at section sites and laboratories where smaller quantities of the solvent are used. waste solvent is illegally included in the road mix as a convenient means of disposal.

- Anything spilled on shop floors goes to sumps, which typically flow to dry wells or french drains. Approximately 103 of the sites evaluated by MDT use dry wells or french drains since they are not currently hooked up to the sewer system.

- Sumps and drainage systems at steam cleaning shops may have released hazardous substances to the ground over a prolonged period of time.

- The ground under chain oiling and storage areas is generally soaked with oil. No provisions are made for containment and cleanup of this oil.

- Waste generated at stockpile sites have been illegally buried onsite.

- Some of MDT's airports have hangers where

airplane maintenance is performed, and these hangers have floor drains which lead to dry wells, french drains, or septic systems. MSE was unable to verify what, if any, wastes are disposed of through these floor drains. Because of the remote locations of most airports, it may be more difficult to properly dispose of wastes. Therefore, the potential exists for an operator to dispose of solvents and oil through the floor drains rather than to properly dispose of them at an authorized facility.

- Outside the hanger at the Rock Creek airport, four empty plastic containers of Curtail herbicide were laying on the ground near an empty, unusable 55-gallon drum. While these items may have been awaiting proper disposal, they illustrate that potentially hazardous substances are used or stored at MDT airports.
- While no agricultural spraying operations were observed at MDT airports, there is a potential for contamination from such operations. It is not clear that MDT has established and enforces rigorous guidelines for handling excess pesticides and for rinsing containers, tanks, nozzles, and aircraft.

The following noteworthy practices were observed during the verification audits:

- A Clinton section employee reported that the Clinton crew regularly picks up any garbage (carcasses, trash) that they find at the airport. They have also picked up used oil filters and taken them into the Missoula complex for proper disposal
- Some maintenance shops have eliminated the use of dry wells and french drains and have replumbed shop drains to reconnect with the sanitary sewer.

5.2.3 FIFRA. *Excess pesticides are present at many of the facilities audited and need to be disposed of.*

Based on discussions with MDT personnel during the verification audits, not all employees are aware of the recommendations for proper storage of pesticides (40 CFR 165, Subpart A). At several locations, excess pesticides were being stored. It appears that a strong effort has not been made to do one of the following: 1) return the pesticides to the manufacturer; 2) ensure they are used within their shelf life; or 3) provide the pesticides to another agent capable of using the product. In addition, storage and disposal of pesticide containers have not always been done in accordance with EPA recommendations or container labels (40 CFR 165, Subpart C). For example, containers are not always tripled rinsed and punctured prior to disposal in a municipal landfill, and often pesticide containers are used to store other liquids.

No noteworthy practices were observed during the verification audits.

5.3 Recordkeeping and Reporting

Very few records that are required to be maintained are kept at MDT facilities. Also, employees do not maintain records for the period of time required in the regulations.

A large percentage of the environmental regulations that apply to MDT operations deal with paperwork. These regulations require that MDT keep copies of certain papers for specified periods of time; provide notice of certain activities; generate specific reports; and/or document specific actions taken. In general, required records are not kept at facilities. MDT employees are not fully aware of what records should be generated and/or kept, for how long, and where.

MSE auditors found that where records are generated during the course of MDT operations, for example where Safety-Kleen drivers require a manifest, copies of such papers are kept by someone at a facility as required. However, the person responsible for maintaining the information is usually not aware of how long it must be kept. Also, supervisory personnel generally do not know of the recordkeeping and reporting requirements for the operations under their direction.

In cases where reports or documentation should be originated by MDT personnel, for instance, SARA Title III reports, hazardous waste logbooks, or self-inspection reports, MDT employees generally are not aware of such requirements. The recordkeeping requirements, and how MDT facilities comply with them, are described in more detail below.

5.3.1 RCRA.

Hazardous Waste

Facilities that generate more than approximately one half of a 55-gallon drum (220 pounds) of hazardous waste in any month, or that accumulate more than about five 55-

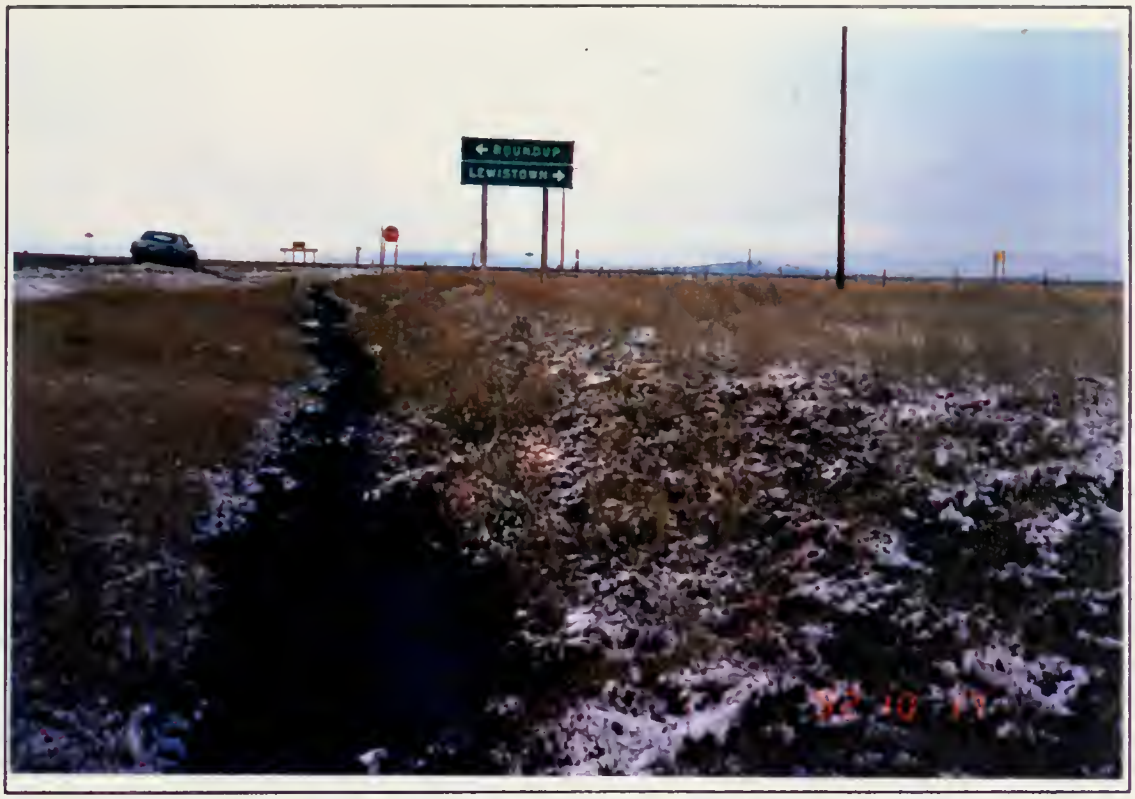

Figure 5-7. Historically, road oil and other materials have been discarded in right-of-ways.

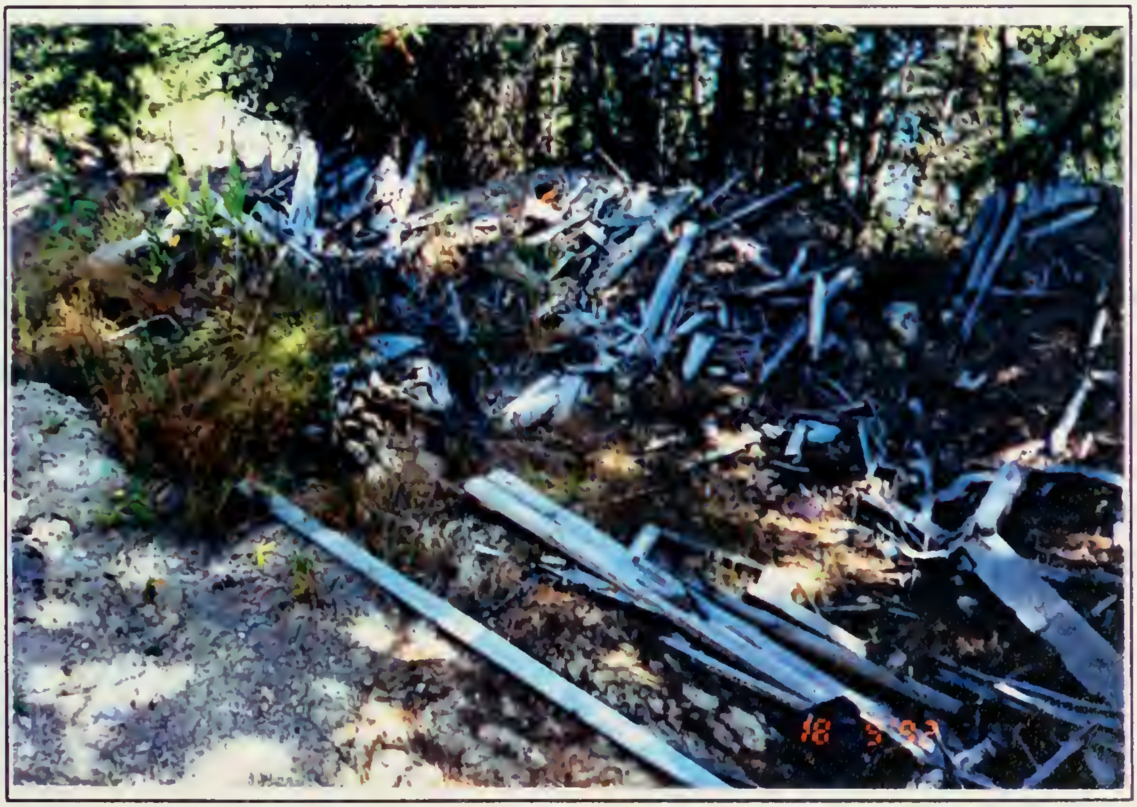

Figure 5-8. Under CERCLA, the MDT is required to identify all potential hazardous waste sites and notify the EPA of their existence.

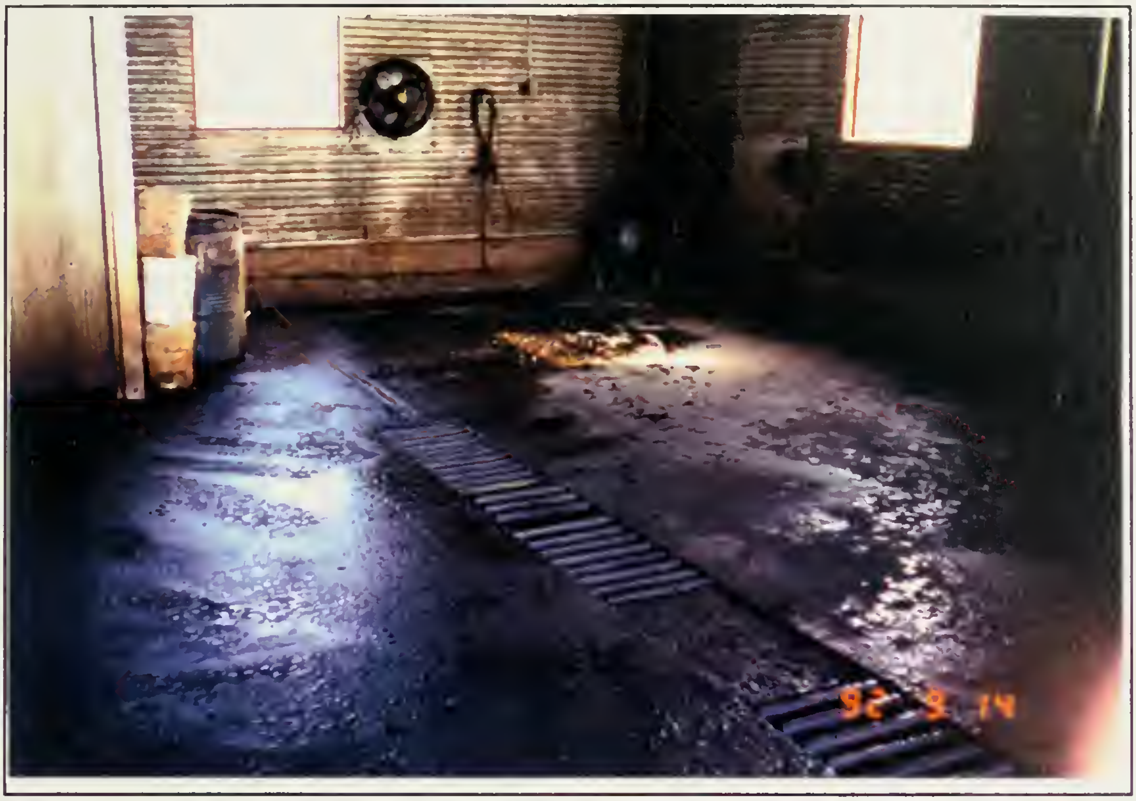

Figure 5-9. Hazardous substances and wastes are often disposed of through floor drains.

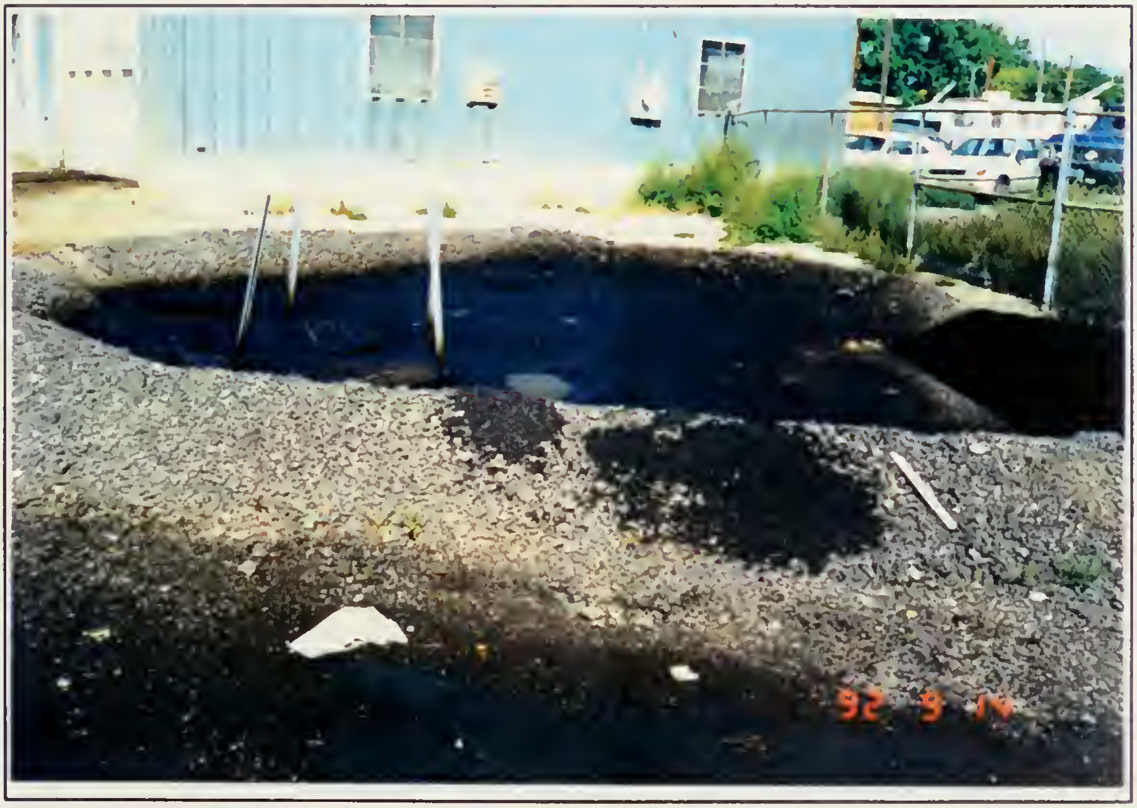

Figure 5-10. Floor drains that are not connected to the city sewer discharge to dry wells, french drains, or sumps, resulting in contamination of the surrounding environment.

gallon drums (2,200 pounds), must obtain an EPA/State hazardous waste ID number and be registered with MDHES (ARM 16.44.403). If a facility is a conditionally exempt small quantity generator (generates less than 220 pounds/month and accumulates less than 2200 pounds at any given time) it is exempt from many of the RCRA requirements for generators.

A generator who ships hazardous waste off-site to a treatment, storage, or disposal (TSD) facility must prepare a manifest on EPA form 8700-22 (ARM 16.44.405). It appears that MDT shipments of hazardous waste to TSDs are complying with this requirement.

If a copy of the manifest signed by the TSD is not received within 60 days (for small quantity generators), MDT must submit to MDHES a copy of that manifest with a letter stating that MDT has not received confirmation of delivery (ARM 16.44.418). Copies of such "exception reports" must be kept for three years. MSE found that some but not all MDT employees are tracking the manifests to receive confirmation of delivery.

A generator must keep a copy (signed by the TSD) of each manifest for three years from the date the waste was accepted by the initial transporter (ARM 16.44.416(1)). In most cases, the shop and laboratory foremen each have files containing all the manifests ever generated; thus, this requirement is being met. However, MSE has found that supervisors are not always aware of their employees requirements regarding manifests. The Department is not training its employees to complete manifests, track the return of signed manifests from disposal facilities, and maintain all manifests for a period of three years.

A generator who ships hazardous waste off-site must submit annual reports to MDHES no later than March 1 of each year (ARM 16.44.417): MDHES mails annual report forms to all generators in January of each year. While annual reports are generally submitted to MDHES by March 1, they are not always correct. The primary error made on annual reports is that they do not count all the hazardous wastes generated at the facility. "Facility" is defined as the whole contiguous property owned and/or operated by MDT. Usually, only the shipments made from a vehicle maintenance shop are counted in an annual report, while hazardous wastes generated at laboratories or by other activities are not reported.

Copies of annual reports must be kept for three years from the due date of the report (ARM 16.44.416(2)). MSE found that employees are not aware of this requirement and, in some cases, copies are not on file for the required period.

Test results, waste analyses, and/or other hazardous waste determinations must be kept for three years from the date that waste was last sent to a TSD facility (ARM 16.44.416(3)). MSE found no such records at any facility.

Small and large quantity generators must maintain a logbook which lists the hazardous waste it has generated by: date, EPA waste number, quantity, and the disposal facility the waste was sent to (ARM 16.44.415(9)). While records are kept at some labs and at some maintenance shops, no logbooks are maintained that contain all the required information, and none of MDT's facilities keep track of waste generation and management on a facility-wide basis. Although this is not required for conditionally exempt small quantity generators, it would be best management practice to keep such a logbook to verify the generator status and document where wastes have been disposed of.

Small and large quantity generators must document attempts to familiarize State or local authorities with the properties of hazardous waste handled and types of injuries or illnesses that could result from fires, explosions, or releases at the facility (ARM 16.44.415(4)(f) & 40 CFR 265). This documentation is required where State or local authorities decline to enter into such arrangements. MDT often satisfies these Preparedness & Prevention requirements through working with local emergency response personnel, but no documentation of emergency response arrangements exists.

Large quantity generators must maintain a Contingency Plan documenting procedures to be taken in case of an emergency (ARM 16.44.415(5)). Some of MDT's facilities would be considered large quantity generators as a result of the waste paints that are currently being stored onsite. These facilities do not have a written Contingency Plan.

Small quantity generators must ensure that employees who handle hazardous wastes are trained in proper procedures. However, large quantity generators must develop a Personnel Training program and maintain records of training that is provided to employees that handle or manage hazardous wastes (ARM 16.44.415(5)). MDT facilities currently storing large quantities of potentially hazardous waste have not developed an appropriate training program and do not maintain the required records.

Used Oil

New RCRA requirements regarding management of used oil have been finalized by EPA. They will become

effective in Montana when they are adopted by MDHES which will likely take 2 years. These are discussed at length in Section 7.0, and include requirements for determining whether the oil is "specification" or "off-specification", how to store and manage the oil in containers, and how the oil can be disposed of. MDT employees need to become familiar with these requirements.

The current regulations require that owners or operators of facilities that burn used oil keep records that show whether the used oil is "specification" or "off-specification" used oil. Used oil that is burned for energy recovery in an oil-fired space heater, boiler, or furnace is considered "specification" oil if it meets certain standards for arsenic, cadmium, chromium, lead, flash point, and total halogens (40 CFR 266.43(b)(1)). Knowledge of the oil can be used in lieu of analytical tests, but documentation must still be kept. No MDT facilities have a written statement explaining how their operations result in the collection of only specification used oil, nor have any used oil samples been submitted for analysis.

If specification used oil is burned onsite in oil-fired space heaters, then analytical results or other information used to determine that the oil meets specifications, such as knowledge of the oil collected, must be kept for three years (40 CFR 266.44(d) and (e)).

If off-specification used oil is burned in an oil-fired space heater, then the generator needs to determine if the heater meets the following requirements:

- Only used oil that is generated by the facility can be burned
- Must have a maximum capacity of 0.5 million BTU/hr
- Must vent combustion gases to the ambient air

If it does, no further requirements apply. If it doesn't meet these, then they must notify MDHES of this activity and obtain an EPA/State ID number. Of the facilities visited that burn used oil, none were aware of these general requirements.

USTs

MDT should have notified MDHES of all tanks (a) operating as of May 8, 1986, (b) closed after January 1, 1984, and (c) brought into operation after May 8, 1986 (ARM 16.45.901 and 902). Records of these notifications must be kept. As discussed in Section 3.2, it appears that MDHES has been notified of all such tanks.

Other records that must be kept include the following. These records must be kept at the site or can be kept at another location provided the records can be easily obtained:

- Reports of suspected or actual releases
- Corrective actions planned or taken
- Information which verifies that corrosion protection equipment is operational and the UST is in compliance with leak detection requirements
- Repairs made to UST systems

MDT's auditors were not asked to provide this information in the abbreviated audit checklists, so MSE did not verify its existence during the verification audits.

5.3.2 CERCLA/SARA. If a facility releases a hazardous substance in quantities equal to or greater than those listed in 40 CFR 302, Table 302.4, "List of Hazardous Substances and Reportable Quantities," in any 24-hour period, it must notify the National Response Center (800-424-8802) (CERCLA S.103(a) & 40 CFR 302). The facility must maintain a record of environmental releases which contains the following information:

- Substances released
- Quantities released
- Dates of releases
- Circumstances of releases
- Remediation of releases.

MSE auditors found no records of releases of hazardous substances. It appeared that employees are aware of the National Response Center, but are not familiar with Table 302.4. (A copy of this table is provided in the MDT Environmental Compliance Audit Training Manual, Volume 2. More readily usable copies are available from the U.S. EPA.)

Facilities must notify the State Emergency Response Commission (SERC) if extremely hazardous substances equal to or in excess of their threshold planning quantities (both listed in 40 CFR 355 Appendix A or B) are stored or used (SARA S.302 & 40 CFR 355.30). If so, the facility must also name an emergency coordinator to the

Local Emergency Planning Committee (LEPC). It appeared that MDT employees have not been directed to determine whether notification and naming of an emergency coordinator are required at their facilities. Examples of threshold planning quantities of extremely hazardous substances that may be present at an MDT facility include:

- 100 pounds of formaldehyde
- One pound of mercuric compounds
- Various compounds found in herbicides.

Facilities must send a written report to the SERC and LEPC (after an initial telephone notification) when a reportable quantity of any extremely hazardous substance or CERCLA hazardous substance is released in a manner that threatens the area beyond the facility's boundaries (SARA S.304 & 40 CFR 355.40). The written report must include:

- The chemical name(s)
- An indication of whether the substance is extremely hazardous
- An estimate of the quantity released
- The time and duration of the release
- Whether the release occurred into the air, water, or land
- Any suspected health risks associated with the emergency
- Proper precautions, such as evacuation
- Name and telephone number of contact person

MSE auditors found that MDT employees are familiar with the emergency response capabilities of the SERC, but are not aware of written notification requirements. Further, it is not clear which employees would have responsibility for determining whether CERCLA/SARA reporting requirements apply to a release to the environment.

Facilities that have "reporting threshold" quantities of hazardous chemicals (those requiring an MSDS) or extremely hazardous substances (in 40 CFR 355 Appendix A or B) must submit copies of their MSDSs, or a list of these chemicals, to the SERC, LEPC, and local fire department (SARA S.311 & 40 CFR 370). New or revised MSDSs must also be submitted as received. In general, MDT personnel have not determined whether this requirement applies to their facilities.

Facilities must submit before March 1 of each year to the SERC, LEPC, and fire department a Tier I or II form describing hazardous chemicals present above "reporting threshold" quantities (SARA S.312 & 40 CFR 370). Again, MDT personnel have not determined whether this requirement applies to their facilities.

5.3.3 FIFRA. EPA's recommendations for storage and disposal of pesticides and pesticide containers are generally not implemented at MDT facilities. It would be best management practice for facilities to evaluate these recommendations in light of the quantity and toxicity of pesticides stored at the site, and implement applicable recommendations.

Facilities should provide documentation of all accidents and incidents (e.g. releases) regarding pesticides, containers, or waste to the U.S. EPA Region 8 Administrator (40 CFR 165 Subpart A). In general, employees were not aware of this recommendation.

Any attempts to return canceled or suspended pesticides to the manufacturer, distributor, or other agent should be documented, along with their responses (40 CFR 165 Subpart B). MDT has not always complied with this recommendation, as 2,4,5-T was not returned to the above entities, and MDT failed to contact EPA to arrange for shipment and storage of the pesticide when it was recalled. As a result, MDT is paying for storage at an authorized facility until the material can be properly disposed of. Further, a relatively small quantity of this pesticide was found at a facility during the audits.

A complete and current inventory should be maintained that indicates the number and identity of containers in each storage unit (40 CFR 165). While appropriate MDT personnel knew what pesticides were stored at their facilities, it did not appear that a written inventory is kept.

Local fire departments, hospitals, public health officials and police departments should be notified in writing of the hazards that stored pesticides might present in a fire (40 CFR 163). The floor plan of the storage area should also be provided to the local fire department. This recommendation was not being met at the facilities audited.

5.3.4 TSCA. Facilities must maintain for five years records and certifications of cleanup of all soil contaminated by a PCB spill (40 CFR 761.125). The

Great Falls Division does have records of a PCB spill cleanup in the yard.

An annual status report to the U.S. EPA is required of facilities that use or store (40 CFR 761.180(a)) any of the following:

- 45 kg of PCBs contained in PCB containers
- One or more PCB transformers
- 50 or more PCB large high- or low-voltage capacitors.

6.0 INSTITUTIONAL FINDINGS

Based upon the information provided by MDT's auditors in the audit and MSE's observations during the verification audits, an analysis has been conducted to help MDT determine what is causing or contributing to the findings discussed in Section 5.0. From MSE's investigations and analysis, it appears that the majority of the findings relate to a smaller number of institutional issues, which we term "root causes." These root causes are identified and discussed below.

Root Cause #1—***Employees lack necessary training, supervision, and procedures to enable them to perform their work activities in an environmentally safe and sound manner.***

Once the policy and tone for responsible environmental management is set, the next step is to educate employees on why this is important and how it can be achieved in their day-to-day work activities. Once again, the Department has made a strong first step in this direction; approximately 40 of MDT's employees have received training on the environmental regulations and how to conduct environmental compliance audits. This will be followed by training on how to correct the findings identified during the audits.

While corrective action training will be provided to the same 40 employees that received the initial audit training, and the Hazardous Materials and Waste Management Plan will soon be available, *all* employees that handle or manage hazardous materials and wastes need to have training that is specific to their job description. For instance, employees that are responsible for cleaning out nurse trucks and paint tanks need to know the answers to the following questions:

- What should be done with excess or waste paints?
- When do spills need to be reported and how should they be managed?
- What types of containers should waste paint or solvents be placed in, how should they be labeled, when do they need to be disposed of, and how long can they remain at the facility before being disposed of? How should waste storage areas be constructed and where?

As another example, employees that handle pesticides or are responsible for managing pesticides stored at the facility need to know the following:

- Is the pesticide considered highly or moderately toxic?
- Where can the pesticide be stored and how?
- What should be done with excess pesticides?
- Where can an empty container be disposed of and are there any special requirements for rinsing the container prior to disposal?

The *MDT Environmental Compliance Audit Training Manual* that MSE prepared for the Department is a tool that can be used by management to train its employees. The answers to many of the questions frequently asked by MDT are provided in the manual through text, figures, tables, and detailed checklists. Likewise, the Hazardous Materials and Waste Management Plan that MSE will be developing soon will also be useful to MDT's training program.

Root Cause #2—***Employees lack an appreciation of risk and responsibility regarding effective environmental management.***

Many of the employees MSE has spoken with during the course of the verification audits have shown tremendous enthusiasm and incentive for wanting to learn how to do the right thing, minimize the waste they produce, etc. Unfortunately, MSE heard from several employees that supervisors and coworkers do not always share their commitment to better environmental management. Some employees apparently feel it is not their responsibility to seek and find the correct answers to questions if their supervisor cannot answer the question. Further, some employees feel that "some of this environmental stuff is ridiculous" and they don't take it very seriously. Many employees did not understand what was wrong with accumulating a few drums of waste at a facility. As the cost to dispose of wastes accumulated throughout the State may exceed $500,000, employees will hopefully gain an appreciation of the costs and liabilities associated with poor environmental management.

Root Cause #3—***The Department does not have an internal audit/appraisal program in place to routinely and systematically monitor facility compliance with environmental regulations.***

Once again, the Department has taken an important step by ensuring that some of MDT's employees have received initial audit training. As a result of MDT's efforts, baseline environmental conditions have beendocumented. Through corrective action training and development of the Hazardous Materials and Waste Management Plan, findings will be addressed.

It's important, however, that an internal audit or appraisal program is developed within the Department to monitor environmental compliance. Such a program would be instrumental to the Department because it will help to identify problems before they become out of control. The information obtained from routine audits can be used to improve training programs, procedures manuals, and other tools that the Department may use to guide its daily operations.

An effective audit program will significantly reduce the Department's environmental liabilities. For instance, if buried waste sites and uncontrolled sumps are discovered during the audit, they can be addressed before they impact nearby surface waters, groundwater, or migrate offsite to an adjacent property owner.

7.0 OTHER ISSUES OF POTENTIAL CONCERN

The purpose of this section is to identify related issues of potential concern to MDT that were either beyond the scope of this project or could not easily be addressed or evaluated during the initial and verification audits. These issues pose unique waste management or environmental considerations that will likely be a part of any future corrective action planning and may influence the development of the Hazardous Materials and Waste Management Plan. They are discussed in greater detail below.

7.1 Management of Treated Timber

Significant quantities of chemically preserved wood have been, and continue to be, used in the Montana Highway System. The potential for unanticipated costs or environmental liabilities from these materials was formally recognized when MDT attempted to dispose of a large quantity of treated wood waste during the summer of 1991. Prior to disposal of that material, MDT had to demonstrate that the wastes were not hazardous wastes under RCRA regulations. As a result, a relatively expensive sampling and analytical program was required to demonstrate that these particular wastes were not hazardous. Despite the fact that the waste materials were not hazardous, MDT found that disposal of the material in a solid waste landfill was quite expensive. The extra expense can be attributed to the fact that these materials contained known hazardous substances and were considered by the landfill operator to represent additional theoretical risk to the disposal company.

The ongoing environmental issues associated with the use of chemically treated wood illustrate the management attention that use of materials containing hazardous substances requires. For example, the regulatory evaluation of treated wood indicated that wood treated with chromated copper arsenate (CCA) could fail regulatory tests under certain circumstances. As a result, these materials would require management as a hazardous waste under the RCRA rules in effect at that time. However, in the July 10, 1992 Federal Register the U.S. Environmental Protection Agency (EPA) revised the regulations so that these materials are now excluded from regulation as hazardous wastes. New perceptions and technical information provide a significant opportunity for regulatory change in the future. Continuing and careful attention is required to keep abreast of these changes as they occur.

Despite the exemption under RCRA, treated wood waste still represents significant potential liability under CERCLA and the Montana Comprehensive Environmental Cleanup and Responsibility Act (CECRA) if inappropriately disposed of. The hazardous substances making up CCA and the organic preservatives, pentachlorophenol (PCP) and creosote, have the potential to migrate into and impact the surrounding environment. They also pose a potential risk to public health, especially if substantial quantities of treated wood are inappropriately disposed of. In fact, limited testing for MDT demonstrated that the copper, chromium, and arsenic in CCA treated wood have the most significant potential of the three preservatives screened for environmental mobility as assessed by the Toxicity Characteristic Leaching Procedure (TCLP).

Careful disposal of these materials is not the only challenge presented by chemically treated wood. In the spring of 1992, the EPA denied blanket certification under Section 401 of the Clean Water Act for the use of chemically treated wood in waters of the United States (including wetlands) residing within the boundaries of Montana's Indian Reservations. Concurrently, the EPA recommended use of non-preserved wood or alternative materials in these locations. Therefore, if the MDT determines that chemically treated wood is the material of choice in one of these areas then specific approval from the EPA is required prior to initiation of the project. At a minimum this step adds to the procedural costs associated with a project. At present, MDHES has not made the same objection to the blanket certification as EPA has. Should this agency do so at some point in the future, many more projects would see an increase in processing costs if treated wood were employed.

The audits conducted by the MDT auditors and the verification audits conducted by MSE revealed that many facilities have accumulated treated wood wastes at their facilities. Some facilities recycle treated wood for other uses. At some facilities, treated wood is burned; this act is prohibited under the Clean Air Act. Based upon conversations with MDT employees, MSE suspects that treated wood wastes have been left for extended periods of time along the rights of way and that historical disposal procedures were casual at best.

MSE is gathering input from regulatory agencies and preparing management recommendations for MDT under a separate contract to specifically address chemically treated wood. These recommendations will be incorporated into the Hazardous Materials and Waste Management Plan as appropriate.

As previously stated, the issues associated with chemically treated wood illustrate the management complexities and potential costs that arise when the hazardous substance containing materials are contemplated for use. Chemically treated wood is just one product used by MDT in significant quantities that falls into this category. Others may also be in use. Often these materials may be the only appropriate product for the situation. A goal of the Hazardous Materials and Waste Management Plan is to identify these kinds of materials early enough in the planning process to see if a suitable alternative exists. If not, necessary controls must be instituted to minimize MDT's environmental liabilities as a result of their use.

7.2 Management of Stormwater Runoff

In November of 1990, the EPA adopted final regulations pertaining to storm water discharges associated with industrial activity. A permit is needed any time storm water leaves an industrial site as a point source and can discharge to surface waters directly or through a drainage system or storm sewer. A point source discharge is defined as any natural or manmade conveyance which carries storm water to surface waters. All facilities covered by EPA's storm water regulations were to have submitted a *Montana Pollutant Discharge Elimination System Application for a General Permit to Discharge Storm Water Associated with Industrial Activity* by October 1, 1992. Applications for new facilities must be submitted 30 to 180 days prior to the completion of the facility.

Construction activities including clearing, grading, and excavation that disturb five acres or more of land, or that disturb one acre or more of land and are within 100 ft of a surface water body, also require a storm water discharge permit. The application for a construction permit must be submitted 30 to 60 days prior to commencing construction.

Based upon discussions with MDHES Water Quality Bureau, none of MDT's permanent facilities will be required to obtain storm water discharge permits at this time. However, all construction activities undertaken by the MDT will be required to submit permits if they meet the criteria described in the above paragraph. The permit should be under both the MDT and contractor's name if the work is being performed by an outside contractor.

An erosion control plan must be included with the application for each construction project. The erosion control plan must include the following items:

- Site description including site map
- Project description
- Description of erosion controls and storm water management controls
- Description and sequence of major construction activities
- Description of waste disposal methods
- Description of off site vehicle tracking
- List of maintenance and inspection procedures for erosion and storm management controls
- Description of spill prevention and materials storage practices

In most cases sampling of storm water runoff will not be required for construction activities. However, if settling ponds are used as a best management practice (BMP), sampling of the effluent for sediment content may be required. BMPs for storm water management will have to be implemented for all permitted construction projects including revegetation, storm water retention basins, sediment traps, dikes, mulching, etc.

7.3 Management of Used Oil

At present, used oil is regulated under RCRA regulations found in 40 CFR Part 266, which have been adopted by reference in ARM 16.44.306(4). However, EPA has finalized new rules for management of used oil, and these can be found in 40 CFR Part 279. They were published in the *Federal Register* on September 10, 1992 and will become effective March, 1993. The MDHES Hazardous Waste Program will adopt these standards or equivalent ones within approximately two years. In the meantime, generators should begin to comply with EPA's new rules (summarized below) as a best management practice.

7.3.1 Used Oil Storage. Generators are required to store used oil in tanks or containers and must maintain all tanks and containers in good operating condition. This means that generators must ensure that all tanks and containers are free of any visible spills or leaks, as well as structural damage or deterioration.

Generators storing used oil in aboveground tanks and containers must clearly label all tanks and containers with the term "used oil." Generators who store used oil in underground tanks must label all fill pipes with the words "used oil."

Underground storage tanks storing used oil must comply with the RCRA Underground Storage Tank requirements of 40 CFR Part 280, such as upgrading, corrosion protection, operation and maintenance, corrective action, and closure. Storage of used oil in lagoons, pits, or surface impoundments is prohibited.

7.3.2 Used Oil Transportation. Transporters shipping used oil for recycling must have an EPA ID number. Unless the State requires it, a manifest will not be required.

Transporters:

- May blend used oils, except they are prohibited from blending used and virgin oils to meet fuel specs. (This is regulated as oil processing.)
- Can store oil in containers or above-ground tanks, which must be labeled, including the fill pipes, and must have secondary containment and oil impervious floors. (Below ground tanks are regulated as USTs.)
- Must maintain records for at least 3 yrs on the acceptance or delivery of each used oil shipment, e.g., an operating record.

7.3.3 Response to Releases. Whenever a release occurs to the environment from aboveground storage tanks and containers, a used oil generator must respond in a timely manner by taking the following steps:

- Stop the release
- Contain the released used oil
- Clean up and properly manage released used oil and materials used for cleaning up/containing the release
- Remove the tank or container from service, repair, or replace the tank or container before returning it to service.

7.3.4 Used Oil Mixed With Hazardous Waste. As in the existing rules, large and small quantity generators are not allowed to mix hazardous waste with used oil except as follows:

- As long as the resultant mixture does not exhibit any characteristics of hazardous waste identified in 40 CFR Part 261 subpart C of RCRA. For instance, the mixture cannot be ignitable, reactive, corrosive, or contain toxic concentrations of metals. Therefore, stoddard solvent can be mixed with used oils for energy recovery, provided that the solvent does not render the mixture ignitable.
- As long as the waste that is mixed with the used oil is hazardous solely because it exhibits the characteristic of ignitability, but, the resultant mixture can no longer exhibit the characteristic of ignitability.

Otherwise, such mixtures are regulated as hazardous waste. Mixtures of used oil and conditionally exempt small quantity generator wastes are regulated as used oil under these rules (40 CFR 279.10(b)(3)).

7.3.5 Off-specification Oils. Used oil is considered off-specification if it exceeds any of the following chemical levels or properties:

- Arsenic > 5 ppm
- Cadmium > 2 ppm
- Chromium > 10 ppm
- Lead > 100 ppm
- Flash point < 100 F
- Total halogens > 4000 ppm

As in the existing rules, used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste and, thus, must be managed as hazardous waste unless the presumption is rebutted. The assumption is that if total halogens exceed 1000 ppm, chlorinated solvents have likely been added to the oil, thereby making it hazardous. The owner or operator may rebut the presumption by demonstrating that used oil does not contain hazardous waste (for example, by using an analytical method from SW-846, Edition III, to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in 40 CFR Part 261, Appendix VIII).

7.3.6 On-site Burning in Space Heaters. Generators may burn used oil in used oil-fired space heaters provided that:

- The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself used oil generators.
- The heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour

- The combustion gases from the heater are vented to the ambient air.

If a generator burns off-specification oil in space heater he must:

- Obtain an EPA ID number (or modify his existing hazardous waste notification);
- Apply the rebuttable presumption and not burn used oil that exceeds 1000 ppm total halogens;
- Comply with the storage requirements outlined above; install secondary containment for tanks and containers holding the used oil; and
- Keep records for at least 3 years of all used oil burned.

7.3.7 Standard for Disposal of Used Oils. Used oils that are not mixed with listed hazardous wastes and do not exhibit a hazardous characteristic may be disposed of in an industrial solid waste landfill or a municipal solid waste landfill. Used oils that are disposed in municipal solid waste landfills after October 9, 1993, must be managed in accordance with the requirements of 40 CFR part 258 - Criteria for Municipal Solid Waste Landfills. MDT should ensure that any facility where used oil is sent is authorized to accept the waste and is in compliance with all applicable regulations. In addition, all nonhazardous used oils that cannot be recycled must be disposed of in accordance with all applicable Federal and State solid waste regulations.

7.3.8 Used Oil as a Dust Suppressant. The use and disposal of used oil as a dust suppressant is prohibited, except when such activity takes place in one of the states that have petitioned the EPA to have a dust suppression program. Montana has not done this, so used oil cannot be used for dust suppression purposes.

7.3.9 Oil Filters.

Used oil filters are not regulated if (a) they are not terne plated and (b) they are drained of oil. Terne plated filters are commonly (but not always) used as spin-on (not cartridge) filters in heavy duty vehicles, commercial trucks (e.g., dump trucks), tractor-trailers, mining & construction vehicles. They may be used in light duty vehicles as well. Terne plating uses an alloy of tin and lead. In analytical tests, terne plated oil filters have exhibited the hazardous characteristic of lead, thus, used terne plated oil filters should be drained and managed as hazardous waste.

EPA requires oil be removed from filters by:

- 1) Puncturing the dome end or anti-drain back valve and Hot-draining (drain near engine-operating temp, 60 degrees F);
- 2) Hot-draining & Crushing;
- 3) Dismantling & Hot-draining; OR
- 4) Equivalent Hot-draining method.

EPA recommends puncturing dome or anti-drain valve and then placing the filter upside down for 12 hours of "hot draining" time.

7.4 Land Management

The MDT, as a large land owner, faces many potential environmental liabilities. The more significant liabilities that MSE has identified as a result of environmental investigations at MDT sites are discussed below.

7.4.1 Current Land Holdings. As the current holder of rights-of-way (ROW) throughout the state, MDT is often the unfortunate recipient of wastes generated by other entities. Highway users often dispose of wastes within the ROW. Even if the material discarded in the ROW is a product which accidentally falls off a transportation vehicle, the material cannot often be identified and used, and thus, becomes a waste. This incident most recently occurred in the Glendive area in December. A barrel of unknown material, believed to be an oil product, was taken to the Glendive Maintenance Shop in December. The drum is not labeled, so its contents will need to be determined and appropriately disposed of.

It's not uncommon for generators to deliberately dispose of wastes, including hazardous wastes, within the ROW. In most cases the discarded waste cannot be tracked, therefore, the landowner on which the waste was disposed of, in this case MDT, becomes the holder of a hazardous waste. Any wastes acquired by MDT as a result of mistaken or deliberate disposal will need to be properly characterized and disposed of. MDT employees must be trained in the RCRA process for determining if a waste is a hazardous waste, so that ultimate disposition of the material is consistent with the regulations. There is little that can be done by MDT to prevent this type of incident from occurring.

As roads are rebuilt and improved throughout the state, materials that pose a potential threat to the environment may be uncovered within the ROW. This incident occurred on a proposed improvement of Highway 1 near Georgetown Lake in Deer Lodge County. The designer determined that the improvement may disturb historical

Butte, Anaconda, and Pacific (BAP) Railroad ballast existing within the ROW. Upon investigation, it was learned that the BAP Railroad in the area is a State of Montana's CECRA hazardous substance site. The materials used to construct the railroad beds were often mining and smelting wastes, containing high concentrations of metals and arsenic. This site was investigated further and it was determined that metals were present but were stable and did not pose a significant threat to the environment. However, it was decided that special precautions should be implemented to prevent the discharge of the metal wastes to Georgetown Lake.

Mine wastes were also involved in roadway repair of Boulder Hill. Contractors obtained mine waste from the Elkhorn Mine and included it with removed asphalt for the remix. It was later determined that the wastes and the remix exhibited high concentrations of mercury. In fact, the remix exceeded TCLP concentrations for mercury. The remix was introduced into a batch plant for reprocessing, and it was determined that the mercury was volatilizing posing a potential health threat to employees. This is another example of the precautions that must be taken to ensure that appropriate materials are selected for inclusion in the road mix.

Proper management of contaminated soils generated from road reconstruction activities is also an important issue that the Department needs to be aware of. These soils may be considered a solid or hazardous waste under RCRA. Recently, road reconstruction activities in Lincoln resulted in the generation of approximately 7,000 cubic yards of contaminated soils underlying the road base. The material was stockpiled in five different locations, several of which were in the 100 year floodplain. Based upon analytical results of the soils, high concentrations of total petroleum hydrocarbons were detected. The soils were likely contaminated as a result of years of roadoiling the old highway. The soils were relocated, but in their initial location, presented substantial liability to the Department and resulted in violation of State water quality rules. The Department is currently working with MDHES Solid and Hazardous Waste Bureau to determine acceptable methods for disposing of the soils.

Management of transportation structures, such as culverts, near water ways and wetlands is another potential concern to the Department. For instance, the Department had plans in 1991 to clean out and extend a culvert under the highway near the Carbonate Tailings on Rogers Pass West. It was later determined that it would be virtually impossible to lengthen the culvert without working in the tailings. Also, there was a concern that flushing out the culvert would impact a downstream wetlands; given the extent to which the culvert was plugged with sediment, cleaning it out would involve flushing out tailings material and possibly increasing the flow of surface water and sediment from the tailings on the north side of the highway to the wetlands on the south. Since the Department would be potentially liable for the tailings as a result of working in the area, the project was never implemented.

Bridge rehabilitation can also pose potential liability to the Department. Many paint chips removed from the bridges exceed TCLP concentrations for lead. If not properly managed, these wastes have the potential to contaminate the surrounding environment. During rehabilitation of the Boulder River Bridge soils were tested to quantify metals content. While soils did not exceed TCLP levels, other metals such as copper were present in the soils at concentrations that could impact the surrounding aquatic environment. Therefore, while TCLP metals are a concern, the Department should also be aware of other metals that have the potential to impact nearby aquatic environments.

7.4.2 Land Acquisition. As roads are constructed, rebuilt, and improved throughout the state, MDT may end up acquiring new ROW and purchasing additional property. With the purchase of new property comes the potential for the acquiring environmental liability.

MDT has considered or actually purchased lands contaminated with mining and metallurgical wastes. However, in two out of three cases, MDT has evaluated the potential environmental liability before purchasing the land. In both of these cases, the liabilities were rather obvious. Nevertheless, MDT needs to make sure that environmental liabilities are evaluated when acquiring new property.

In a proposed improvement to the Yaak River Road near Sylvanite, in Lincoln County, the design called for the purchase of new ROW. There were historical gold mill tailings present on the land in question. While the current landowner perceived the tailings to be an asset due to their gold content, they were, in fact, a liability due to the amount and nature of lead in the tailings. MDT recognized the liability and determined the probable cost to remediate the tailings, so a fair price was able to be negotiated for the property.

At a similar site near Anaconda, in Deer Lodge County, MDT design calls for a rebuild of Highway 273 and the acquisition of new ROW. This site happens to fall within the Clark Fork River Federal Superfund site. As a result, MDT decided to investigate potential environmental liability before proceeding with the project. It was determined that there is heavy metal and arsenic contamination present within the proposed new ROW. MDT is working with EPA, MDHES, and the current landowner to determine the best way to proceed.

APPENDIX A

MDT Abbreviated Environmental Audit Checklist

MONTANA DEPARTMENT OF TRANSPORTATION ENVIRONMENTAL COMPLIANCE AUDIT CHECKLIST AND REPORT

Facility Audited: ______________________________

Facility Location: ______________________________

District: ______________________________

Auditor's Name: ______________________________

Auditor's Work Phone: ______________________________

Date of Audit: ______________________________

Instructions

This audit checklist is to be used for all audits conducted at MDT facilities. You may still need to refer to the more comprehensive checklists found in Volume 2, Section 2 of the audit manual to obtain a better understanding of why a particular question in this abbreviated checklist is being asked. Therefore, you should refer to the other checklists, as you feel necessary, to supplement this checklist. We have indicated which detailed checklists you should refer to for more information.

Instead of using the audit report forms contained in Volume 2, Section 3 of the audit manual, use the space available in this checklist to document the audit findings. If you don't have enough room on this checklist to write, please use a separate piece of paper rather than write on the back of a page. The information you provide will help MSE determine which environmental regulations are applicable to MDT's facilities. Therefore, its better to supply more information than not enough.

A site map or plot plan must be completed for each site and needs to identify the locations where hazardous materials are stored, the processes that use hazardous materials or generate hazardous wastes, and the locations where hazardous waste are stored, treated, or disposed of. Photographs should also be taken, where possible, to further document audit findings.

All completed audit checklists, site maps, and photographs should be sent to MSE, Inc., at the following address:

Kathy DeMarinis
MSE, Inc.
P.O. Box 4078
Butte, MT 59702

Facility Management

1. What is the function of this facility/location? Provide a description of the activities conducted at this location.

___ maintenance shop
___ laboratory
___ section site
___ other (specify) ______________________________

2. Who is the primary contact for questions relating to environmental and waste management activities at this location?

name: ______________________________
position: ______________________________
mailing address: ______________________________
____
____
telephone number: ______________________________

Hazardous Materials and Products

1. What materials (products) are used or stored at the facility (i.e., paint thinner, paint, solvent, oil, acids, alkalies)? Please attempt to list ALL products. Also, indicate whether or not a Material Safety Data Sheet (MSDS) is available for the product. (See CERCLA/SARA Hazardous Chemical Reporting Checklist, C-SHC)

	Material	Use	Quantity Stored	MSDS
Ex.	Stoddard Solvent	Degreaser	1 55-gallon drum	Available

Hazardous Materials and Products, continued

2. How are materials or products that are no longer used or needed disposed of?

	Material	Disposal Method
Ex.	paints	community landfill
Ex.	solvents	sump/drainfield/sewer

Solid and Hazardous Waste

1. Is this location registered with the Montana Department of Health and Environmental Sciences (MDHES) as a generator of hazardous waste?

   ___ yes, the Generator ID # is ______________________________
   ___ no
   ___ not sure

2. What are the solid and hazardous wastes that are CURRENTLY generated at this location (i.e., spent solvents, paint wastes, used oil, spent lead acid batteries, off-specification products that will need to be disposed of)? Identify the processes that are generating this waste. Also, identify how often these wastes are generated. Be sure to note those wastes that are ROUTINELY generated on a monthly basis, so we can determine the generator status of the facility (i.e., conditionally exempt, small, or large quantity generator). (See RCRA Figures 1 and 2 to determine if a solid waste is also a hazardous waste. Figure 3 provides the quantity limitation for each generator status.)

	Waste	Process	Monthly Quantity
Ex.	Paint sludges	Cleaning out paint tanks	300 gallons/2 yrs
Ex.	Excess paints	Tank Overflows	1 55-gal drum/mo.
Ex.	Spent solvents	Cleaning nozzles	1 quart/mo.
Ex.	Carburetor cleaner and filters	vehicle maintenance	5 gals/mo.
Ex.	Floor sump sludges, might contain solvents	Cleaning out sumps	20 gallons/year

Solid and Hazardous Waste, continued

3. How are each of the wastes identified in question #2 disposed of (i.e., onsite dumping, ditch, septic system, burned as fuel in oil-fired space heater, sewer, impoundment, landfill, offsite-commercial disposal or recycling facility, county landfill)?

	Waste	Disposal Practice
Ex.	paint wastes	local county landfill
Ex.	used oil	offsite recycler/onsite burning

4. Are there containers (i.e., drums or tanks) of known or unknown wastes present at this location that are currently being stored onsite? If so, provide the following information so that samples can be collected to make a hazardous waste determination, and the waste can be properly disposed of. Also, indicate if any of the containers are leaking, their general condition, and if spills or stained soils are present around them. (See the RCRA checklists, Use and Management of Containers, R-H-I, and Tank Systems, R-H-J.)

	Container	Contents
Ex.	4 drums, uncovered	not sure, oily/sludge-like mixture
Ex.	6 drums, covered	not sure, but paint spills on the outside, so it may contain striping paint
Ex.	1 drum, covered	label indicates toluene, but not sure if that is actually what's in the drum

Pesticides/Herbicides

1. Are Pesticides presently used at this facility or have they ever been used in the past? (See FIFRA reference in Volume II, Section 2)

___ no
___ yes. Specify the following

	Pesticide	Classification	Frequency of Use
Ex.	2,4-D	Highly/moderately toxic	April-Aug, 1/mo

	Pesticide	Storage Area	Disposal Practice
Ex.	2,4-D	Shed, stored above ground, See attached map	Returned to manufacturer

2. Who is the licensed pesticide applicator?

Name ____
Position ____
Location ____
Category ____

Are they certified?
___ no
___ yes

3. Are there any licensed pesticide operators at the facility?
___ no
___ yes. If yes, provide the following information:
name: ____
last date licensed: ____________________________

Pesticides/Herbicides, continued

4. Are there pesticides stored at the facility that are beyond their expiration date or have been cancelled or suspended? If yes, list below. (See FIFRA Pesticide Storage and Disposal Regulations Checklist, F-PP, item 5.)

5. Is there a record file available which contains information identifying specific pesticides that are currently being used at the facility? If yes, summarize the kinds of records being kept. (See FIFRA Pesticide Storage and Disposal Regulations checklist, F-PP.)

Pesticides/Herbicides, continued

6. What procedures are used to dispose of pesticide containers? Are there written procedures available which identify how this is to be done? If written procedures are available, attach a copy.

7. Are there any pesticide storage sites or facilities on the property? Are these sites and facilities appropriately located and constructed? (See FIFRA Pesticide Storage and Disposal Regulations checklist, F-PS, items 18, 19, and 20.)

Pesticides/Herbicides, continued

8. Are pesticide containers which contain highly or moderately toxic pesticides appropriately labeled and stored? Describe the discrepancies noted. (See FIFRA Pesticide Storage and Disposal Regulations checklist, F-PS, items 21-35.)

APPENDIX B

MDHES UST Database Reviewed by MSE

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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-101770     BEAVERHEAD           DILLON SECTION HEADQUARTERS      3625 HWY 91 NORTH                DILLON              59725 JACK BROWN            (406) 683 2208

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Gasoline                  1,200   18  Bare Steel            Bare Steel
2            Remv    Diesel                    1,000   14  Bare Steel            Bare Steel
3            Remv    Diesel                      300   20  Bare Steel            Bare Steel
4            Curr    Diesel                    4,000    4  Bare Steel            Galvanized Steel
5            Curr    Gasoline                  2,000    4  Bare Steel            Galvanized Steel
6            Curr    Gasoline                  2,000   14  Bare Steel            Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-101064     BEAVERHEAD           MT DEPT HWY-LIMA SITE            LIMA                             LIMA     .          59739 JIM BROWN             (406) 276-3485

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Diesel                    2,000   14  Bare Steel            Bare Steel
2            Curr    Gasoline                  1,000   14  Bare Steel            Bare Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-101059     BEAVERHEAD           MT DEPT HWY-WISDOM SITE          WISDOM                           WISDOM              59761 RICHARD WEAVER        (406) 689-3115

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Gasoline                  2,000   17  Bare Steel            Bare Steel
2            Curr    Diesel                    1,000   17  Bare Steel            Bare Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-209497     BIG HORN             MT DEPT HWY-BUSBY SITE           BOX 224                          BUSBY               59016 MONTANA DEPARTMENT OF HIGHWAYS (406)
 592-3628

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Gasoline                  2,000   12  Bare Steel            Unknown
2            Curr    Diesel                    1,000   12  Bare Steel            Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-209498     BIG HORN             MT DEPT HWY-HARDIN SITE          BOX 483                          HARDIN              59034 MONTANA DEPARTMENT OF HIGHWAYS (406)
 665-3666

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Diesel                    2,000   16  Bare Steel            Unknown
2            Curr    Gasoline                    560   16  Bare Steel            Unknown
3            Curr    Gasoline                  1,000   17  Unknown               Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-209502     BIG HORN             MT DEPT HWY-LODGE GRASS SITE     BOX 545                          LODGE GRASS         59050 MONTANA DEPARTMENT OF HIGHWAYS (406)
 639-2221

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Remv    ROAD OIL                 12,000   10  Bare Steel            Unknown
2            Curr    Diesel                    2,000   10  Bare Steel            Unknown
3            Curr    Gasoline                  1,000   10  Bare Steel            Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-402602     BROADWATER           TOWNSEND MAINTENANCE SITE        SOUTH OF TOWNSEND                TOWNSEND            59644 GEROLD OLSEN          (406) 266-5571

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Gasoline                  2,000   16  Bare Steel            Bare Steel
2            Curr    Diesel                    1,000   16  Bare Steel            Bare Steel
3            Curr    Diesel                    2,000    6  Bare Steel            Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-503442     CARBON               F&S GARAGE                                                        BEARCREEK           59007 CHARLIE PETERSON      (406) 265-1484
                                                                                                                                                         255
Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1            Remv    Gasoline                    500  Unk  Bare Steel            Galvanized Steel     Not Marked
2            Remv    Gasoline                    500  Unk  Bare Steel            Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------  Zip-  Manager       - - - Mgr. Telephone
0-509496     CARBON               MT DEPT HWY-BRIDGER SITE          BOX 49                            BRIDGER              59014 MONTANA DEPARTMENT OF HIGHWAYS (406)
 662-3637

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      ---  RD (Piping)
1            Curr    Gasoline                  2,000   11  Bare Steel            Unknown
2            Curr    Diesel                      560   11  Bare Steel            Unknown
3            Curr    Gasoline                    500   11  Bare Steel            Unknown
TEMP1        Curr    Gasoline                  2,000  Unk
TEMP2        Curr    Diesel                    2,000  Unk

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-509495     CARBON               MT DEPT HWY-RED LODGE SITE        BOX 445                           RED LODGE            59068 MONTANA DEPARTMENT OF HIGHWAYS (406)
 446-2811

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Curr    Diesel                    4,000   12  Bare Steel            Unknown
2            Curr    Gasoline                  2,000   12  Bare Steel            Unknown
3            Curr    Gasoline                  1,000   12  Bare Steel            Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------  Zip-  Manager------------- Mgr. Telephone
0-609681     CARTER               MT DEPT HWYS - BOYES SEC HQ       US 212                            BOYES                59316 LESTER STRADTMAN       (406) 427 5345

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      ---  RD (Piping)
4305D        Curr    Diesel                    1,000   15  Bare Steel            Bare Steel
4305R        Curr    Gasoline                  1,000   15  Bare Steel            Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------  Zip-- Manager------------- Mgr. Telephone
0-704049     CASCADE              MT DEPT HWY-BELT SITE             MILE POST 71 ON U.S. 89           BELT                 59412 CARL A. SWANSON        (406) 727-4350

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Curr    Gasoline                  2,000   12  Bare Steel            Bare Steel
2            Curr    Diesel                    4,000   12  Bare Steel            Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-- --------- Mgr. Telephone
0-704051     CASCADE              MT DEPT HWY-CASCADE SITE          MILE POST 0 ON P 68 (MAIN ST.)    CASCADE              59421 KELLY, DAVE            (406) 727-4350

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      ----  RD (Piping)
1            Remv    Gasoline                  1,000   29  Bare Steel            Bare Steel
2            Remv    Diesel                    1,000   19  Bare Steel            Bare Steel
3            Curr    Gasoline                  2,000    2  STIP3                 Fiberglass          Suction -- No Valve  Vapor Monitoring
4            Curr    Diesel                    2,000    2  STIP3                 Fiberglass          Suction -- No Valve  Vapor Monitoring

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
0-704047     CASCADE              MT DEPT HWY DISTRICT OFFICE       104 18TH AVENUE NE                GREAT FALLS          59404 CARL A. SWANSON        (406) 727 4350

Tank ID---   Status  Product -----------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)           RD (Piping)
1            Curr    Gasoline                 10,000    9  Fiberglass            Bare Steel
2            Remv    Diesel                    6,000   33  Bare Steel            Bare Steel
3            Remv    Diesel                   12,000   33  Bare Steel            Bare Steel
4            Curr    Gasoline                  2,500   12  Bare Steel            Bare Steel
5            Curr    Diesel                   12,000    2  Bare Steel            Fiberglass          Suction -- Valve     Inventory Control    Line Tightness

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------  Zip - Manager ------------ Mgr. Telephone
0-704039     CASCADE              MONTANA D.O.H. MAINTENANCE SECTI  MILE POST 50 ON U.S. 89           MONARCH              59463 CARL A. SWANSON        (406) 727 4350

Tank ID---   Status  Product- -----------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      ----  RD (Piping)
1            Remv    Gasoline                  1,000   29  Bare Steel            Bare Steel
2            Remv    Diesel                      500   28  Bare Steel            Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------  Zip-- Manager--- --------- Mgr. Telephone
0-704050     CASCADE              MT DEPT HWY-NEIHART SITE          MILE POST 37.9 ON U.S. 89         NEIHART              59465 CARL A. SWANSON        (406) 727 4350

Tank ID--    Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type          RD (Tanks)      - -  RD (Piping)
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1          Curr    Gasoline                    2,000    8  Bare Steel              Bare Steel
2          Curr    Diesel                      4,000    8  Bare Steel              Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
0-704043     CASCADE              MT DEPT HWY-SUN RIVER SITE      MILE POST 3.5 ON MT 200, US 89  SUN RIVER           59483 CARL A. SWANSON      (406) 727-4350

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)           RD (Piping)
1            Remv    Gasoline                1,000   27   Bare Steel           Bare Steel
2            Remv    Diesel                  1,000   19   Bare Steel           Bare Steel
3            Curr    Diesel                  2,000    2   Bare Steel           Galvanized Steel    Suction -- No Valve  Inventory Control
4            Curr    Gasoline                2,000    2   Bare Steel           Galvanized Steel    Suction -- No Valve  Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
0-804048     CHOUTEAU             MT DEPT HWY-FORT BENTON SITE    MILE POST 2.5 ON S 387          FORT BENTON         59442 CARL A. SWANSON      (406) 727-4350

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----- RD (Piping)
1            Remv    Gasoline                1,000   31   Bare Steel           Bare Steel
2            Remv    Diesel                  1,000   19   Bare Steel           Bare Steel
3            Curr    Diesel                  2,000    2   Bare Steel           Fiberglass          Suction -- No Valve  Inventory Control
4            Curr    Gasoline                2,000    2   Bare Steel           Fiberglass          Suction -- No Valve  Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip - Manager------------ Mgr. Telephone
0-909677     CUSTER               MT DEPT HWY-MILES CITY SEC HQ   3RD AND ORR STREET              MILES CITY          59301 JOHN BICKLE          (406) 232-1093

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----- RD (Piping)
4300D        Curr    Diesel                  1,000   14   Bare Steel           Bare Steel
4300HP       Curr    Gasoline                2,000   14   Bare Steel           Bare Steel
4300R        Curr    Gasoline               12,000   14   Bare Steel           Bare Steel
4300U        Curr    Gasoline                6,000    8   Bare Steel           Bare Steel
6            Curr    Gasoline               12,000   Unk  Cath. Steel          Fiberglass          Suction -- No Valve  Vapor Monitoring
S5           Remv    Heating Oil               300   Unk  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
0-909680     CUSTER               MT DEPT HWYS -BEAVERSLIDE SEC HQ MT 59                          MILES CITY          59301 TRUMAN A. BOVEE III  (406) 421-5573

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----- RD (Piping)
4303D        Remv    Diesel                  1,000   18   Bare Steel           Bare Steel
4303R        Remv    Gasoline                1,000   18   Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
0-909684     CUSTER               MT DEPT HWYS -FIDDLEBACK SEC HQ US 12                           PLEVNA              59344 LARRY W. MAIER       (406) 772-5523

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----- RD (Piping)
4302A        Curr    ASPHALT                 8,000   10   Bare Steel           Bare Steel
4302D        Curr    Diesel                  1,000   15   Bare Steel           Bare Steel
4302R        Curr    Gasoline                1,000   15   Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
1-004031     DANIELS              MDOT - SCOBEY SECTION           MONTANA #13 NORTH  MILEPOST 51.6 SCOBEY             59263 BILL JUVE            (406) 653-1050

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----- RD (Piping)
1            Remv    Gasoline                1,000   21   Bare Steel           Galvanized Steel
2            Curr    Diesel                  2,000    8   Bare Steel           Galvanized Steel
3            Curr    Gasoline                2,000    1   Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring     Vapor Monitorin

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip - Manager------------ Mgr. Telephone
1-102576     DAWSON               MONTANA DEPARTMENT OF HIGHWAYS  503 NORTH RIVER AVENUE          GLENDIVE            59330 ROBERT A. WEBB       (406) 365-5296

Tank ID---   Status  Product------------ Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----- RD (Piping)
1            Remv    Diesel                  1,000    9   Cath. Steel          Galvanized Steel
2            Remv    Diesel                  1,000    9   Cath. Steel          Galvanized Steel
3            Remv    Gasoline                1,000    9   Cath. Steel          Galvanized Steel
4            Curr    Used Oil                1,000   10   Bare Steel           Galvanized Steel
5            Remv    Gasoline               10,000   20   Bare Steel           Galvanized Steel
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6            Curr    Gasoline                 10,000    1  Fiberglass            Galvanized Steel      Suction    No Valve    Inventory Control
7            Curr    Diesel                   10,000    1  Fiberglass            Galvanized Steel      Suction -- No Valve    Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU   ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip   Manager -           -   Mgr. Telephone
1-103557     DAWSON              MT DEPT HWY-GLENDIVE MP SITE     P.O. BOX 890, 503 N. RIVER AVE.  GLENDIVE            59330

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     ---- -  RD (Piping)
1            Remv    Gasoline                  6,000   13  Bare Steel            Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager ------ - --  Mgr. Telephone
1-102615     DAWSON              RICHEY (DEPT OF HIGHWAYS)        MT 200 EAST OF RICHEY            RICHEY              59259 ROBERT A WEBB        (406) 365-5296

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     -----  RD (Piping)
1            Remv    Gasoline                  1,000   24  Bare Steel            Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager ----- - --  Mgr. Telephone
1-201063     DEER LODGE          ANACONDA MAINTENANCE SITE        717 EAST FRONT STREET            ANACONDA            59711 DENNIS DEMERS        (406) 563-7307

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Gasoline                  4,000   11  Bare Steel            Galvanized Steel
2            Curr    Diesel                    2,000   11  Bare Steel            Galvanized Steel
3            Curr    Gasoline                  1,000   11  Bare Steel            Galvanized Steel
4            Curr    Gasoline                  1,000   11  Bare Steel            Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager ------------ Mgr. Telephone
1-309679     FALLON              MT DEPT HWY-BAKER SITE           413 W. MONTANA AVE.              BAKER               59313 STEVE STEPHENSON     (406) 232-1093

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     -----  RD (Piping)
4314D        Curr    Diesel                    4,000    8  Bare Steel            Bare Steel
4314HP       Remv    Gasoline                  1,000   23  Bare Steel            Bare Steel
4314R        Remv    Gasoline                  1,000   24  Bare Steel            Bare Steel
4314U        Remv    Gasoline                  1,000   24  Bare Steel            Bare Steel
5            Curr    Gasoline                  2,000    0  Fiberglass            Fiberglass            Suction -- No Valve    Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------  Zip-- Manager------------ Mgr. Telephone
1-404072     FERGUS              MT DEPT HWY-DENTON SITE          RTE 81 - M.P. 12.9 ON MT 81      DENTON              59430 HOYT DUBOIS          (406) 567-2201

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     -----  RD (Piping)
1            Curr    Diesel                    2,000   15  Bare Steel            Bare Steel
2            Curr    Gasoline                  1,000   15  Bare Steel            Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------ Mgr. Telephone
1-404065     FERGUS              MDOT GRASS RANGE SITE            RTE 61 - M.P. 44.1 ON US 87      GRASS RANGE         59032 ARCHIE LITTLE        (406) 538-8731

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     --  RD (Piping)
1            Curr    Diesel                    2,000   12  Bare Steel            Bare Steel
2            Remv    Gasoline                  2,000   32  Bare Steel            Bare Steel
3            Curr    Gasoline                  2,000    2  Cath. Steel           Bare Steel                                Vapor Monitoring

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------ Mgr. Telephone
1-404062     FERGUS              MT DEPT HWY-LEWISTOWN SITE       WEST OF LEWISTOWN, P.O. BOX 491  LEWISTOWN           59457 MONTANA DEPARTMENT OF HIGHWAYS (406)
 538-8731

Tank ID---   Status  Product------------   Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)     ----  RD (Piping)
1            Curr    Gasoline                 10,000   13  Bare Steel            Bare Steel
2            Curr    Diesel                   10,000   13  Bare Steel            Bare Steel
3            Remv    Gasoline                  2,000   27  Bare Steel            Unknown
4            Remv    Diesel                    1,000   27  Bare Steel            Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name---------------- -- Street Address------------------ Location City-----   Zip   Manager----   ------ Mgr. Telephone
1-408791     FERGUS              MT DEPT HWY LEWISTOWN SITE       WEST OF LEWISTOWN                LEWISTOWN           59000 MONTANA HIGHWAY PATR (406) 444-3283

Tank ID---   Status  Product---- -  ---   Capacity-   Age  Mat'l of Construct.   Piping Material       Piping Type         RD (Tanks)            RD (Piping)
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1          Remv    Gasoline                    1,000   22  Unknown                    Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-404064     FERGUS               MT DEPT HWY-MOBRIDGE SITE        RTE 61 - M.P. 86.8 ON US 191      ROY                 59471 LEWIS E. HARRELL     (406) 464 5251

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----  RD (Piping)
1           Curr    Gasoline                    1,000    6  Bare Steel           Bare Steel
2           Remv    Diesel                      2,000    9  Bare Steel           Bare Steel
3           Curr    ROAD OIL                    8,000   13  Bare Steel           Unknown
4           Remv    Gasoline                    1,000   12  Bare Steel           Unknown
5           Remv                                  150  Unk  Unknown              Unknown
6           Curr    Diesel                      2,000    2  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-404063     FERGUS               MT DPET HWY-ROY SECTION          RTE 43 - M.P. 35.6 ON US 191      ROY                 59471 THOMAS SIROKY        (406) 464-7551

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----  RD (Piping)
1           Curr    Diesel                      2,000   16  Bare Steel           Unknown
2           Remv    Gasoline                    1,000   29  Bare Steel           Unknown
3           Curr    Diesel                      2,000    2  Cath. Steel          Fiberglass

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-508738     FLATHEAD             MDOT BIGFORK MAINTENANCE SITE    MILE 35 HIGHWAY 35                BIGFORK             59911 WILLIAM MCCHESNEY    (406) 755 5717

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----- RD (Piping)
1           Remv    Diesel                      1,000   21  Bare Steel           Galvanized Steel
2           Remv    Gasoline                    1,000   21  Bare Steel           Galvanized Steel
3           Curr    Gasoline                    2,000    1  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring     Vapor Monitorin
4           Curr    Diesel                      2,000    1  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring     Vapor Monitorin

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-508735     FLATHEAD             MT DEPT HWY-COLUMBIA FALLS       U.S. 2                            COLUMBIA FALLS      59912 LEROY LUCKE          (406) 892-2071

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----- RD (Piping)
1           Remv    Gasoline                    1,100   19  Bare Steel           Galvanized Steel
2           Remv    Diesel                      1,100   19  Bare Steel           Galvanized Steel
3           Curr    Gasoline                    2,000    4  Bare Steel           Galvanized Steel
4           Curr    Diesel                      2,000    4  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-508733     FLATHEAD             MDOT KALISPELL SITE              #8 5TH AVENUE EN                  KALISPELL           59901 WILLIAM MCCHESNEY    (406) 755-5717

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----- RD (Piping)
1           Remv    Gasoline                    2,000   26  Bare Steel           Unknown
2           Remv    Gasoline                    1,000   26  Bare Steel           Unknown
4           Curr    Gasoline                   10,000    1  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring     Vapor Monitorin
5           Curr    Diesel                     12,000    1  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring     Vapor Monitorin
S3          Curr    Diesel                      1,295   26  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1 508734     FLATHEAD             LAKESIDE MAINTENANCE             U.S. 93                           LAKESIDE            59922 DON LOVELESS         (406) 755 5717

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----- RD (Piping)
1           Remv    Diesel                        550   26  Bare Steel           Galvanized Steel
2           Remv    Gasoline                    1,000   26  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-508744     FLATHEAD             MT DEPT HWY-MARION SITE          8003 HIGHWAY 2 WEST               MARION              59925 ROY KIDDER           (406) 854 2626

Tank ID---  Status  Product--------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    ----- RD (Piping)
1           Remv    Gasoline                    1,040   19  Bare Steel           Galvanized Steel
2           Remv    Diesel                      1,020   19  Bare Steel           Galvanized Steel
4           Curr    Gasoline                    1,000    4  Bare Steel           Galvanized Steel
5           Curr    Diesel                      1,000    4  Bare Steel           Galvanized Steel
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S3           Remv    Diesel                       310    19  Bare Steel              COPPER

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1-508747     FLATHEAD            MT DEPT HWY-OLNEY SITE          HIGHWAY 93 NORTH                  OLNEY                 59927 BILL PRICE          (406) 881-2[illegible]

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----  RD (Piping)
1            Remv     Gasoline                   1,000   15  Bare Steel            Galvanized Steel
2            Remv     Diesel                     1,000   15  Bare Steel            Galvanized Steel
4            Curr     Gasoline                   1,000    4  Bare Steel            Galvanized Steel
5            Curr     Diesel                     1,000    4  Bare Steel            Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1-604056     GALLATIN            MT DEPT HWY-BIG SKY SITE        US 191 BIG SKY                    BIG SKY               59716 RICHARD L. MILLER   (406) 586-9562

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----- RD (Piping)
1            Curr     Diesel                     4,000   12  Bare Steel            Galvanized Steel
2            Curr     Gasoline                   6,000   12  Bare Steel            Galvanized Steel
TEMP1        Curr     Gasoline                     500  Unk
TEMP2        Curr     Diesel                     2,500  Unk

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1 604052     GALLATIN            MT DEPT HWY-BOZEMAN SITE        907 NORTH ROUSE, P.O. BOX 1110    BOZEMAN               59771 RICHARD L. MILLER   (406) 586-9562

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----- RD (Piping)
1            Remv     Gasoline                   6,000   20  Bare Steel            Galvanized Steel
2            Curr     Gasoline                  10,100   26  Bare Steel            Galvanized Steel
3            Curr     Diesel                     6,000    8  Bare Steel            Galvanized Steel
4            Curr     Used Oil                     300    8  Bare Steel            Galvanized Steel
5            Curr     Used Oil                     300   19  Bare Steel            Galvanized Steel
TEMP1        Curr     Diesel                    10,000  Unk

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1-604060     GALLATIN            MT DEPT HWY-THREE FORKS SITE    I-90 THREE FORKS                  THREE FORKS           59752 JERRY R. WADE       (406) 586-9562

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----- RD (Piping)
1            Curr     Gasoline                   1,000   22  Bare Steel            Galvanized Steel
2            Curr     Gasoline                   1,000   22  Bare Steel            Galvanized Steel
3            Curr     Diesel                     1,000   22  Bare Steel            Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1 604057     GALLATIN            MT DEPT HWY-DUCK CREEK SITE     US 191 DUCK CREEK JUNCTION        WEST YELLOWSTONE      59758 HOWARD MICHEWRIGHT  (406) 646-7268

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----  RD (Piping)
1            Remv     Gasoline                   6,000   20  Bare Steel            Galvanized Steel
2            Remv     Diesel                     6,000   27  Bare Steel            Galvanized Steel
3            Remv     Diesel                     2,000   45  Bare Steel            Galvanized Steel
4            Curr     Diesel                     1,250   19  Bare Steel            Galvanized Steel
5            Curr     Diesel                       500   15  Bare Steel            Galvanized Steel
6            Curr     Gasoline                   2,000    0  Cath. Steel           Fiberglass            Suction -- Valve     Manual Gauging
7            Curr     Diesel                     6,000    0  Cath. Steel           Fiberglass            Suction -- Valve     Manual Gauging

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1 702616     GARFIELD            MT DEPT HWY-FLOWING WELLS SEC   JCT MT 200 AND MT 24              BROCKWAY              59214 ROBERT A WEBB       (406) 365-5296

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----- RD (Piping)
1            Curr     Diesel                     1,000    7  Bare Steel            Galvanized Steel
2            Curr     Gasoline                   1,000    7  Bare Steel            Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
1-703566     GARFIELD            MONTANA HIGHWAY DEPARTMENT                                        JORDAN

Tank ID---   Status   Product-------------  Capacity--  Age  Mat'l of Construct.   Piping Material       Piping Type          RD (Tanks)     ----  RD (Piping)
1            Remv     Gasoline                   1,000   12  Unknown               Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------ ------ Mgr. Telephone
1 702614     GARFIELD             MT DEPT HWY-JORDAN SECTION       JCT MT 200 & MT 245              JORDAN              59337 DICK WILEY

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
1           Remv    Diesel                   1,000   11  Bare Steel            Galvanized Steel
2           Remv    Gasoline                 1,000   14  Bare Steel            Unknown
3           Curr    Diesel                   2,000    2  Fiberglass            Fiberglass                            Manual Gauging
4           Curr    Gasoline                 2,000    2  Fiberglass            Fiberglass                            Manual Gauging

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-709686     GARFIELD             MT DEPT HWYS - HILLSIDE SEC HQ   MT 22                            JORDAN              59337 GORDON GOULD         (406) 354-6171

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
4309D       Curr    Diesel                   1,000   15  Bare Steel            Bare Steel
4309R       Curr    Gasoline                 1,000   15  Bare Steel            Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-804035     GLACIER              MT DEPT HWY-BROWING SITE                                          BROWNING            59417 ALFRED J. SMITH      (406) 338-2610

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
1           Curr    Gasoline                 1,000   18  Bare Steel            Galvanized Steel
2           Curr    Diesel                   2,500   18  Bare Steel            Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1 804034     GLACIER              MT DEPT HWY-CUT BANK SITE                                         CUT BANK            59427 LEONARD NYGAARD      (406) 873-211

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                 1,000   18  Bare Steel            Galvanized Steel
2           Remv    Diesel                   1,000   18  Bare Steel            Galvanized Steel
3           Remv    Gasoline                   500   20  Unknown               Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-802018     GLACIER              MT DEPT HWY-EAST GLACIER SITE    U.S. 2                           EAST GLACIER        59434 TONY BABCOCK         (406) 226-5565

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
S1          Curr    Gasoline                 5,000   14  ABOVE GROUND          Galvanized Steel
S2          Curr    Diesel                   5,000   14  ABOVE GROUND          Galvanized Steel
S3          Curr    Diesel                   5,000   14  ABOVE GROUND          Galvanized Steel
S4          Curr    Diesel                   8,000   14  ABOVE GROUND          Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
1-904069     GOLDEN VALLEY        MT DEPT HWY-RYGATE SITE          RTE 14 - M.P. 129.9 ON US 12     RYEGATE             59074 DONALD KOSBAB        (406) 568-2380

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
1           Remv    Diesel                   1,000   32  Bare Steel            Unknown
2           Curr    Gasoline                 1,000   17  Bare Steel            Bare Steel
3           Curr    Diesel                   2,000    2  Cath. Steel           Fiberglass                            Vapor Monitoring

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-009294     GRANITE              MT DEPT HWY-DRUMMOND SHOP        MILE POST 62.8 MT 1              DRUMMOND            59832 JAMES MORSE          (406) 288 3200

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                 1,000   23  Bare Steel            Galvanized Steel
2           Curr    Gasoline                 2,000    9  Bare Steel            Galvanized Steel
3           Curr    Diesel                   4,000   10  Bare Steel            Galvanized Steel
4           Remv    Gasoline                 3,000    6  Bare Steel            Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-009295     GRANITE              MT DEPT HWY-PHILISBURG SITE      BOX 328                          PHILIPSBURG         59858 JAMES REYNOLDS       (406) 859 39

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material     Piping Type       RD (Tanks)     -----  RD (Piping)
1           Curr    Diesel                   2,000   10  Bare Steel            Bare Steel
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2           Curr     Gasoline                      4,000   10  Bare Steel              Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County ---- Location Name------------------ Street Address---------------   Location City------- Zip - Manager                 Mgr. Telephone
2-104032     HILL                 MT DEPT HWY-HAVRE SITE          HIGHWAY 2 WEST OF HAVRE          HAVRE                59501 DENNIS CLINE           (406) 265 6821

Tank ID---   Status   Product-----------    Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)        ---  RD (Piping)
1            Remv     Gasoline                 6,000    16  Bare Steel             Galvanized Steel
2            Curr     Diesel                   2,000    18  Bare Steel             Galvanized Steel
3            Remv     Gasoline                 3,000    13  Bare Steel             Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU   ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County- --- Location Name------------------ Street Address------------------ Location City------- Zip - Manager-------------- Mgr  Telephone
2-202609     JEFFERSON            BASIN MAINTENANCE SITE          BASIN                            BASIN                      JACK REILLY          (406) 225-3919

Tank ID---   Status   Product------------   Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
F1           Remv     Gasoline                 1,000    26  Bare Steel             Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager ---------- Mgr. Telephone
2-210518     JEFFERSON            MT. DEPT. OF HWYS/BERNICE       I-15, MILEPOST 152               BERNICE              59000 GORDON GIULIO         (406) 225 3788

Tank ID---   Status   Product------------   Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
1            Curr     Diesel                   4,000     6  Bare Steel             Galvanized Steel
2            Curr     Gasoline                 4,000     6  Bare Steel             Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-202604     JEFFERSON            MT DEPT HWY-BOULDER SITE        HIGHWAY 19                       BOULDER              59702 JACK REILLY           (406) 225-3919

Tank ID---   Status   Product------------   Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
1            Curr     Gasoline                 4,000     7  Bare Steel             Bare Steel
2            Curr     Diesel                   2,000    16  Bare Steel             Bare Steel
3            Curr     Gasoline                 2,000    16  Bare Steel             Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-208918     JEFFERSON            MONTANA DEPT OF HIGHWAYS        512 1ST STREET EAST              WHITEHALL            59759 DARYELL D. COGDILL  (406) 287-3819

Tank ID---   Status   Product------------   Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
1            Remv     Diesel                   1,000    36  Bare Steel             Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County- - - Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-201771     JEFFERSON            MT DEPT HWY-CRICKS CAMP SITE    CRICKS CAMP                      WHITEHALL            59759 PAUL ZAHN             (406) 689-3115

Tank ID---   Status   Product----------     Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
2            Curr     Gasoline                 2,000     2  Bare Steel             Bare Steel             Suction -- No Valve  Manual Gauging         Vapor Monitorin
3            Curr     Diesel                   6,000     2  Bare Steel             Bare Steel             Suction -- No Valve  Tightness Testing      Vapor Monitorin
F1           Remv     Gasoline                 1,000    21  Bare Steel             Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City ------ Zip-- Manager------------- Mgr. Telephone
2-203573     JEFFERSON            WHITEHALL MAINTENANCE SITE      E. OF WHITEHALL/JCT. MT-69       WHITEHALL            59759 DARYL COGDILL         (406) 287-5503

Tank ID---   Status   Product------------   Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
1            Curr     Gasoline                 3,000    11  Bare Steel             Galvanized Steel
2            Curr     Gasoline                 4,000     4  Bare Steel             Galvanized Steel
3            Curr     Diesel                   4,000     4  Bare Steel             Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-304071     JUDITH BASIN         MT DEPT HWY  STANFORD SITE      RTE 80 - M.P. 67.0 ON MT 80      STANFORD             59479 ARCHIE LITTLE         (406) 538 8731

Tank ID---   Status   Product------------   Capacity--  Age  Mat'l of Construct.    Piping Material        Piping Type         RD (Tanks)      -----  RD (Piping)
1            Curr     Gasoline                 2,000    17  Bare Steel             Bare Steel
2            Remv     Diesel                   1,000    34  Bare Steel             Bare Steel
3            Curr     Diesel                   2,000     2  Cath. Steel            Galvanized Steel                           Vapor Monitoring
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2 408741     LAKE                 MT DEPT HWY-ELMO MAINTENCE      MT. 28                          ELMO                59915 KEN BLUSH            (406) 849 5329

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)        -  RD (Piping)
1           Remv    Gasoline                 1,000    24  Bare Steel           Bare Steel
2           Remv    Diesel                   1,000    24  Bare Steel           Bare Steel
3           Curr    Diesel                   1,000     4  Fiberglass           Galvanized Steel
4           Curr    Gasoline                 1,000     4  Fiberglass           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2 408740     LAKE                 MT DEPT HWY-POLSON SITE         U.S. 93                         POLSON              59860 WAYNE GRYDE          (406) 883-4240

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     ----  RD (Piping)
1           Remv    Diesel                   1,000    20  Bare Steel           Galvanized Steel
2           Remv    Gasoline                 1,000    20  Bare Steel           Galvanized Steel
4           Curr    Diesel                   1,000     4  Bare Steel           Galvanized Steel
5           Curr    Gasoline                 1,000     4  Bare Steel           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2-409296     LAKE                 MT DEPT HWY-RAVALLI SITE        P.O. BOX 7039                   RAVALLI             59863 FRANCIS ROLLINS      (406) 745-4373

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    -----  RD (Piping)
1           Remv    Diesel                   1,000    27  Bare Steel           Unknown
2           Remv    Gasoline                 1,000    31  Bare Steel           Unknown
3           Curr    Diesel                   2,000     7  Bare Steel           Galvanized Steel
4           Curr    Diesel                   2,000     7  Bare Steel           Galvanized Steel
5           Curr    Gasoline                 2,000     7  Bare Steel           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2-409297     LAKE                 MT DEPT HWY-RONAN SITE          MILE POST 42.0 US 93            RONAN               59864 JOHN DELAURENTI      (406) 644-2220

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    -----  RD (Piping)
1           Curr    Diesel                   2,000     8  Bare Steel           Galvanized Steel
2           Remv    Diesel                   1,000    14  Bare Steel           Unknown
3           Curr    Gasoline                 4,000    17  Bare Steel           Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2-408739     LAKE                 MDOT SWAN LAKE SITE             HIGHWAY 83                      SWAN LAKE           59911 WILLIAM MCCHESNEY    (406) 755 5717

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    -----  RD (Piping)
1           Remv    Diesel                   1,000    26  Bare Steel           Galvanized Steel
2           Remv    Diesel                   1,000    26  Bare Steel           Galvanized Steel
3           Remv    Gasoline                   500     8  Bare Steel           Galvanized Steel
4           Curr    Gasoline                 2,000     1  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring         Vapor Monitorin
5           Curr    Diesel                   2,000     1  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring         Vapor Monitorin
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2-504044     LEWIS & CLARK        MT DEPT HWY-AUGUSTA SITE        MILE POST 39 ON US 287          AUGUSTA             59410 KELLY, DAVE          (406) 727-4350

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    -----  RD (Piping)
1           Remv    Gasoline                 1,000    31  Bare Steel           Bare Steel
2           Remv    Diesel                   1,000    19  Bare Steel           Bare Steel
3           Curr    Gasoline                 2,000     2  STIP3                Fiberglass          Suction -- No Valve  Inventory Control
4           Curr    Diesel                   2,000     2  STIP3                Fiberglass          Suction -- No Valve  Inventory Control
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA            MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------ Mgr. Telephone
2-502606     LEWIS & CLARK        HELENA FAIRGRNDS MAINT. SITE    CUSTER AND HENDERSON            HELENA                    WALTER J TRESCH      (406) 444-6388

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)    -----  RD (Piping)
1           Curr    Diesel                  10,000    13  Bare Steel           Bare Steel
2           Curr    Gasoline                 2,000    13  Bare Steel           Bare Steel
3           Curr    Gasoline                 4,000    13  Bare Steel           Bare Steel
4           Remv    Gasoline                 4,000    26  Bare Steel           Unknown
5           Remv    Used Oil                 8,000    26  Bare Steel           Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------ ----------- Location City------- Zip-- Manager          ------ Mgr. Telephone
2-502608     LEWIS & CLARK        MACDONALD PASS MAINTENANCE SITE  U S HIGHWAY 12 MCDONALD PASS      HELENA                    JOHN BLACKER             (406) 442 4642

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     - ---  RD (Piping)
1           Remv    Gasoline                  2,000   17  Bare Steel           Bare Steel
2           Remv    Gasoline                  2,000   17  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-508429     LEWIS & CLARK        MDOT MOTOR POOL                  6TH & ROBERTS                     HELENA              59620 SUE NICHOLS              (406) 444 2705

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Curr    Gasoline                 10,000   18  Bare Steel           Galvanized Steel   Suction -- No Valve
2           Curr    Gasoline                  4,000   18  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----  Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-506849     LEWIS & CLARK      . MT DEPT HWY-HELENA EQUIP SHOP    2701 PROSPECT AVE.                HELENA              59620 HAROLD P. MOHN           (406) 444 6321

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Curr    Diesel                    2,000    9  Bare Steel           Galvanized Steel
2           Curr    Gasoline                  2,000    9  Bare Steel           Galvanized Steel
3           Curr    Gasoline                  2,000    9  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-507590     LEWIS & CLARK        RIMINI MAINTENANCE SITE                                            HELENA              59601 JOHN BLACKER             (406) 442 4642

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Unk     Diesel                    4,000  Unk  Bare Steel           Galvanized Steel
2           Unk     Gasoline                  4,000  Unk  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-504042     LEWIS & CLARK        MT DEPT HWY LINCOLN SITE         MILE POST 76 ON MT 200            LINCOLN             59639 CARL A. SWANSON          (406) 727-4350

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Curr    Gasoline                  2,000   10  Bare Steel           Bare Steel
2           Remv    Diesel                    1,000   10  Bare Steel           Bare Steel
3           Curr    Diesel                    4,000   10  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-504041     LEWIS & CLARK        ROGERS PASS MAINTENANCE SITE     MILE POST 97.1 ON MT 200          LINCOLN             59639 MICHAEL MOODY            (406) 235-4402

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   33  Bare Steel           Bare Steel
2           Remv    Diesel                    1,000   19  Bare Steel           Bare Steel
3           Curr    Gasoline                  2,000    2  Cath. Steel          Fiberglass         Suction -- No Valve  Inventory Control
4           Curr    Gasoline                  2,000    2  Cath. Steel          Fiberglass         Suction -- No Valve  Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
2-504040     LEWIS & CLARK        MT DEPT HWY-WOLF CREEK SITE      MILE POST 8.8 ON FRONTAGE ROAD    WOLF CREEK          59648 CARL A. SWANSON          (406) 727-4350

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   24  Bare Steel           Bare Steel
2           Curr    Diesel                    2,000    6  Bare Steel           Bare Steel
3           Curr    Gasoline                  2,000    2  Bare Steel           Fiberglass         Suction -- No Valve  Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------- -------- Location City------- Zip-- Manager------------- Mgr. Telephone
2-604033     LIBERTY              MT DEPT HWY-CHESTER SITE                                           CHESTER             59522 JIM MARSHALL             (406) 759 5616

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  2,500   18  Bare Steel           Galvanized Steel
2           Remv    Diesel                      600   18  Bare Steel           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip - Manager-------------- Mgr. Telephone
2-708749     LINCOLN              MT DEPT HWY-EUREKA SITE          210 MT HIGHWAY 37                 EUREKA               59917 HUBERT MCKENZIE       (406) 296-2980

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)         --  RD (Piping)
1           Curr    Diesel                    2,000   38  Bare Steel           Fiberglass                              Tightness Testing      Line Tightness
2           Curr    Diesel                    2,000   38  Bare Steel           Fiberglass                              Tightness Testing      Line Tightness
S1          Curr    Gasoline                  1,000   57  ABOVEGROUND          Galvanized Steel
S2          Curr    Diesel                    1,000   57  ABOVEGROUND          Galvanized Steel
S3          Curr    Diesel                      500   17  ABOVEGROUND          COPPER

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager- ------------ Mgr. Telephone
2-708745     LINCOLN              MT DEPT HWY-CRYSTAL CRK. SITE    S. HIGHWAY 2                      LIBBY                59923 LEONARD PARADIS       (406) 293-4200

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                  1,100   19  Bare Steel           Galvanized Steel
2           Remv    Diesel                    1,100   19  Bare Steel           Galvanized Steel
4           Curr    Gasoline                  1,000    4  Bare Steel           Galvanized Steel
5           Curr    Diesel                    1,000    4  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
2-708750     LINCOLN              MT DEPT HWY-JENNINGS SITE        HIGHWAY 37 EAST                   LIBBY                59923 KARL NORVELL          (406) 293-7921

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)      -----  RD (Piping)
1           Curr    Gasoline                  1,000   24  Bare Steel           Bare Steel
2           Remv    Gasoline                  1,000   24  Bare Steel           Bare Steel
S3          Remv    Diesel                    1,000   24  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
2-708751     LINCOLN              MT DEPT HWY-LIBBY SITE           SOUTH HIGHWAY 2                   LIBBY                59923 ANDY BLOHM            (406) 892-3681

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                  1,000   21  Bare Steel           Bare Steel
2           Remv    Diesel                    1,000   21  Bare Steel           Bare Steel
4           Curr    Gasoline                  1,000   16  Unknown              Unknown
5           Curr    Gasoline                  2,000    0  Fiberglass           Fiberglass         Suction -- No Valve
6           Curr    Diesel                    2,000    0  Fiberglass           Fiberglass         Suction -- No Valve
S3          Remv    Diesel                    1,400   21  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
2-708748     LINCOLN              MT DEPT HWY-REXFORD SITE         HIGHWAY 37                        REXFORD              59930 HUBERT MCKENZIE       (406) 296-2980

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                  1,000   26  Bare Steel           Galvanized Steel
2           Remv    Diesel                    1,000   26  Bare Steel           Galvanized Steel
S3          Curr    Diesel                      300   26  Bare Steel           Galvanized Steel
S4          Curr    Diesel                      300   26  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
2-708752     LINCOLN              MT DEPT HWY-TROY SITE            HIGHWAY 2                         TROY                 59935 GARY JONE             (406) 295-5753

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                  1,000   21  Bare Steel           Galvanized Steel
2           Remv    Diesel                    1,000   21  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
2-804058     MADISON              MT DEPT HWY-ENNIS MAINT. SITE    US 286 - ENNIS                    ENNIS                59729 JERRY WADE

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                  1,250   39  Bare Steel           Galvanized Steel
2           Curr    Diesel                    4,000    7  Bare Steel           Galvanized Steel
3           Curr    Diesel                    2,000    2  Cath. Steel          Fiberglass                              Vapor Monitoring

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
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2-804059     MADISON               MT DEPT HWY-HARRISON SITE       US 287 - HARRISON                HARRISON              59735  JERRY R. WADE         (406) 586-9562

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -- --  RD (Piping)
1           Curr    Gasoline                  1,000   12  Bare Steel           Bare Steel
2           Curr    Diesel                    1,000   12  Bare Steel           Bare Steel
TEMP1       Curr    Gasoline                    500  Unk
TEMP2       Curr    Diesel                    2,500  Unk

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
2-801060     MADISON               TWIN BRIDGES SECTION HEADQRTS   S. OF TWIN BRIDGES ON MT-287     TWIN BRIDGES          59754  RICHARD DULANEY       (406) 684 5714

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -----  RD (Piping)
1           Remv    Gasoline                  2,000   14  Bare Steel           Bare Steel
2           Remv    Diesel                      300   14  Bare Steel           Bare Steel
3           Curr    Diesel                    2,000    8  Bare Steel           Galvanized Steel
4           Curr    Gasoline                  2,000    8  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
2-902613     MCCONE                MT DEPT HWY-CIRCLE SITE         MT 200 EAST OF CIRCLE            CIRCLE                59215  ROBERT A WEBB         (406) 365 5296

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -----  RD (Piping)
3           Curr    Diesel                    2,000    6  Bare Steel           Cath. Protection
4           Curr    Gasoline                  2,000    6  Bare Steel           Cath. Protection

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA               . MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
3-012376     MEAGHER               MONTANA DEPARTMENT OF HIGHWAYS  705 3RD AVENUE SW                WHITE SULPHUR SPRING  59648  ARNOLD BLAIR          (406) 547-3531

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -----  RD (Piping)
S1          Curr    Heating Oil               4,000   12  ABOVEGROUND TANK     Galvanized Steel   Suction -- Valve

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
3-002607     MEAGHER               MT DEPT HWY DEEP CREEK SITE     DEEP CREEK                       WHITE SULPHUR SPRING         ARNOLD BLAIR          (406) 547-3531

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -----  RD (Piping)
1           Remv    Diesel                    1,000   21  Bare Steel           Bare Steel
2           Remv    Diesel                    1,000   21  Bare Steel           Bare Steel
S3          Curr    Heating Oil               1,300  Unk  ABOVEGROUND TANK     COATED BLACK       Suction -- Valve

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
3-002603     MEAGHER               MT DEPT HWY-WHITE SULPHER SPR   HIGHWAY 12                       WHITE SULPHUR SPRING  59702  ARNOLD BLAIN          (406) 547-3531

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -----  RD (Piping)
1           Curr    Diesel                    4,000    7  Bare Steel           Bare Steel
2           Curr    Gasoline                  2,000    7  Bare Steel           Bare Steel
3           Curr    Gasoline                  2,000    7  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
3-109300     MINERAL               MT DEPT HWY-SALTESE SITE        BOX 6                            SALTESE               59867  BILL BETHEL           (406) 678-4281

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -----  RD (Piping)
1           Curr    Diesel                    2,000    8  Bare Steel           Galvanized Steel
2           Curr    Diesel                    2,000    8  Bare Steel           Galvanized Steel
3           Curr    Gasoline                  2,000   20  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County-----  Location Name------------------  Street Address-----------------  Location City-------  Zip--  Manager------------  Mgr. Telephone
3-109299     MINERAL               MT DEPT HWY-SUPERIOR SITE       41 DIAMOND ROAD                  SUPERIOR              59872  LARRY BULLOCK         (406) 822-3386

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type         RD (Tanks)  -      RD (Piping)
1           Curr    Diesel                    4,000    9  Bare Steel           Galvanized Steel
2           Curr    Gasoline                  2,000    9  Bare Steel           Galvanized Steel
3           Remv    Gasoline                  1,000   21  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU   ALYCE FISHER  HELENA                   MT  59620  LEWIS & CLARK
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Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209303     MISSOULA             MT DEPT HWY-ALBERTON SITE        MILE POST 75.5 I-90              ALBERTON            59820 GEORGE SWARTZ        (406) 549-6491

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)           RD (Piping)
1           Curr    Diesel                   4,000    9   Bare Steel           Galvanized Steel
2           Curr    Gasoline                 2,000    9   Bare Steel           Galvanized Steel
3           Remv    Gasoline                 1,000   23   Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209307     MISSOULA             MT DEPT HWY-CLINTON SITE         PO BOX 92/MILE POST 7.5 SEC 210  CLINTON             59825 ARNOLD ZACHARIASEN   (406) 825-4970

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)    -----  RD (Piping)
1           Remv    Gasoline                 1,000   18   Bare Steel           Unknown
2           Curr    Diesel                   2,000    9   Bare Steel           Galvanized Steel
3           Curr    Gasoline                 4,000    9   Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209302     MISSOULA             MT DEPT HWY-EVARO SITE           BOX 7039; MISSOULA               EVARO               59801 BILL MECHESNEY       (406) 726-3760

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)    -----  RD (Piping)
1           Curr    Diesel                   1,000    8   Bare Steel           Galvanized Steel
2           Curr    Gasoline                 2,000    8   Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209301     MISSOULA             MT DEPT HWY-LOLO SITE            MILE POST 9.6 US 12              LOLO                59847 HENRY HOWARD         (406) 273-0252

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)    -----  RD (Piping)
1           Curr    Diesel                   4,000    9   Bare Steel           Galvanized Steel
2           Remv    Gasoline                 1,000   18   Bare Steel           Unknown
3           Remv    Gasoline                 1,000   21   Bare Steel           Unknown
4           Curr    Gasoline                 2,000    3   Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209304     MISSOULA             MISSOULA MAINTENANCE SITE        2100 WEST BROADWAY               MISSOULA            59801 F. KEITH MCFARLANE   (406) 549-6491
                                                                   P.O. BOX 7039

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)    -----  RD (Piping)
1           Curr    Gasoline                10,000    8   Bare Steel           Galvanized Steel
2           Remv    Gasoline                 8,000   28   Bare Steel           Bare Steel
3           Remv    Diesel                   4,000   28   Bare Steel           Bare Steel
4           Curr    Used Oil                   550   23   Bare Steel           Galvanized Steel
5           Remv    Gasoline                 4,000   26   Bare Steel           Unknown
6           Curr    Diesel                  10,000    3   Bare Steel           Bare Steel
7           Curr    Used Oil                 1,000  Unk   Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-212498     MISSOULA             MONTANA DEPARTMENT OF HIGHWAYS   ORANGE STREET & MILWAUKEE RAILROAD UNDERPASS MISSOULA          59802 MICHAEL A. FRIEDRICH (40
6) 549-6491

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)    -----  RD (Piping)
1           Remv    UNKNOWN                    500  Unk   Unknown              Bare Steel
2           Remv    Gasoline                   500  Unk   Unknown              Bare Steel
3           Remv    Kerosene                   500  Unk   Unknown              Bare Steel
4           Remv    Diesel                     500  Unk   Unknown              Bare Steel
5           Remv    UNKNOWN                    500  Unk   Unknown              Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209857     MISSOULA             SALVATION ARMY BUILDING          339 WEST BROADWAY                MISSOULA            59801 MONTANA DEPARTMENT OF HIGHWAYS (000)
 000-0000

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type        RD (Tanks)    -----  RD (Piping)
S1          Remv    FUEL OIL                   200   28   Bare Steel           COPPER

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA          MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-209305     MISSOULA             MT DEPT HWY-CLEARWATER SITE      MILE POST 31.1 MT 200            SEELEY LAKE         59868 DONALD NILES         (406) 244-5652
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Tank ID---  Status  Product-  ---------  Capacity   Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)       -  RD (Piping)
1           Remv    Gasoline                1,000    23  Bare Steel            Unknown
2           Curr    Diesel                  2,000     9  Bare Steel            Galvanized Steel
3           Curr    Gasoline                4,000     9  Bare Steel            Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-209306     MISSOULA             MT DEPT HWY-RAINY LAKE SITE     MILE POST 27.5 MT 83            SEELEY LAKE         59868 BRUCE FRIEDE          (406) 677 2599

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Curr    Gasoline                2,000    10  Bare Steel            Galvanized Steel
2           Curr    Diesel                  4,000    10  Bare Steel            Galvanized Steel
3           Remv    Gasoline                1,000    23  Bare Steel            Unknown
4           Remv    Diesel                  1,000    23  Bare Steel            Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-304068     MUSSELSHELL          MDOT HIGHWAYS DIVISION          RTE 61 - M.P. 0.7 ON US 87      ROUNDUP             59072 GORDON CHARLTON       (406) 323-2075
                                                                  1150 MAIN STREET

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Curr    Diesel                  1,000    22  Bare Steel            Bare Steel
2           Curr    Gasoline                1,000    22  Bare Steel            Bare Steel
3           Curr    Diesel                  2,000     1  Fiberglass            Fiberglass           Suction -- No Valve  Vapor Monitoring        X
4           Curr    Gasoline                2,000     1  Fiberglass            Fiberglass           Suction -- No Valve  Vapor Monitoring        X
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-303565     MUSSELSHELL          MT DEPT HWY-ROUNDUP SITE        ROUNDUP SECTION                 ROUNDUP

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Remv    Gasoline                1,000    12  Bare Steel            Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County---- Location Name------------------- Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-404055     PARK                 MT DEPT HWY-CARBELLA SITE       US 89, 17 MI. N. OF GARDINER    GARDINER            59030 JEROME DYBA           (406) 587-5785
                                                                  MILEPOST 16.8

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Remv    Gasoline                  660    39  Bare Steel            Galvanized Steel
2           Curr    Gasoline                1,000     2  Cath. Steel           Fiberglass                                Vapor Monitoring
3           Curr    Diesel                  2,000     2  Cath. Steel           Fiberglass                                Vapor Monitoring
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-408794     PARK                 MONTANA HIGHWAY PATROL                                          LIVINGSTON          59000 MONTANA HWY. PATROL   (406) 444 3283

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Remv    Gasoline                1,000    21  Unknown               Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-404053     PARK                 MT DEPT HWY-LIVINGSTON SITE     WEST OF LIVINGSTON              LIVINGSTON          59047 RICHARD L. MILLER     (406) 586 9562

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Curr    Diesel                  7,900    22  Bare Steel            Galvanized Steel
2           Curr    Gasoline                1,000    22  Bare Steel            Galvanized Steel
TEMP1       Curr    Gasoline                  500   Unk
TEMP2       Curr    Diesel                  2,500   Unk
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
3-404054     PARK                 MT DEPT HWY-WILSALL SITE        MILEPOST 23.7  U.S. 89 NORTH    WILSALL             59086 RUSSELL ROONEY        (406) 578-2554

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.   Piping Material      Piping Type          RD (Tanks)   -----  RD (Piping)
1           Remv    Gasoline                1,250    35  Bare Steel            Galvanized Steel
2           Curr    Diesel                  1,000     5  Bare Steel            Bare Steel
3           Curr    Gasoline                2,000     2  Cath. Steel           Fiberglass                                Vapor Monitoring
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                  MT  59620  LEWIS & CLARK
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Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City---- -- Zip-- Manager ------------ Mgr. Telephone
3-504066     PETROLEUM            MT DEPT HWY-WINNETT SITE         RTE 5, 244 M.P. ON SEC 244       WINNETT                 59087 JACK BARISICH        (406) 429-5831

Tank ID---  Status  Product----------  -  Capacity -  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)       --  RD (Piping)
1           Curr    Diesel                   2,000   32   Bare Steel           Unknown
2           Curr    Gasoline                 1,000   17   Bare Steel           Bare Steel
3           Curr    Diesel                   1,000   32   Bare Steel           Unknown
4           Curr    Diesel                   2,000    2   Cath. Steel          Fiberglass                               Tightness Testing

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-604029     PHILLIPS             MT DEPT HWY-MALTA SITE           HIGHWAY 191 MILEPOST 155.3       MALTA                   59538 HAROLD OLSON         (406) 654-2579

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
1           Curr    Gasoline                 2,000    8   Bare Steel           Galvanized Steel
2           Curr    Diesel                   1,000   21   Bare Steel           Galvanized Steel
3           Curr    Diesel                   2,000   14   Bare Steel           Galvanized Steel
4           Remv    Used Oil                   300   14   Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-703564     PONDERA              MONTANA HIGHWAY DEPARTMENT                                        CONRAD

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                 1,000   13   Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-704038     PONDERA              MT DEPT HWY-CONRAD SITE          I-15, MILEPOST 339.3             CONRAD                  59425 HUCH LARSON          (406) 278-7931

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                 6,000   26   Bare Steel           Galvanized Steel
2           Remv    Diesel                   4,000   26   Bare Steel           Galvanized Steel
3           Remv    UNKNOWN                    500   23   Unknown              Unknown
4           Curr    Gasoline                 2,000    2   Cath. Steel          Galvanized Steel     Not Marked          Vapor Monitoring       Vapor Monitorin
5           Curr    Diesel                   2,000    2   Cath. Steel          Galvanized Steel     Not Marked          Vapor Monitoring       Vapor Monitorin

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-704036     PONDERA              MT DEPT HWY-DUPUYER SITE                                          DUPUYER                 59432 DAVID E. WALL        (406) 472-3270

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
1           Remv    Gasoline                 2,000   18   Bare Steel           Galvanized Steel
2           Remv    Diesel                   2,000   18   Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3 809682     POWDER RIVER         MDOT BROADUS SECTION YARD        U.S. 212  MILE POST 79.3         BROADUS                 59317 STEVE STEPHENSON     (406) 232-1093

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
1           Curr    Diesel                   1,000   23   Bare Steel           Bare Steel
2           Remv    Gasoline                   500   12   Bare Steel           Bare Steel
3           Curr    Gasoline                 1,000   23   Bare Steel           Bare Steel
4           Curr    Gasoline                 2,000    1   Fiberglass           Fiberglass           Suction -- No Valve Manual Gauging
5           Curr    Diesel                   2,000    1   Fiberglass           Fiberglass           Suction -- No Valve Manual Gauging

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-902605     POWELL               DEER LODGE MAINTENANCE SITE                                       DEER LODGE                    CHARLES BAUMAN       (406) 846-1204

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
1           Curr    Diesel                   4,000   11   Bare Steel           Bare Steel
2           Curr    Gasoline                 3,000   11   Bare Steel           Bare Steel
3           Curr    Gasoline                 2,000   11   Bare Steel           Bare Steel
4           Curr    Gasoline                 1,000   11   Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4 002612     PRAIRIE              MT DEPT HWY-TERRY SECTION        JCT MT 40 & I-94 S OF TERRY      TERRY                   59349 ROBERT A WEBB        (406) 365-5296

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)      -----  RD (Piping)
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1           Remv    Diesel                   1,000    8  Bare Steel          Galvanized Steel
2           Remv    Gasoline                 1,000   24  Bare Steel          Unknown
3           Curr    Gasoline                 2,000    0  Fiberglass          Galvanized Steel     Suction -- No Valve    Manual Gauging          Vapor Monitorin
4           Curr    Diesel                   2,000    0  Fiberglass          Galvanized Steel     Suction -- No Valve    Manual Gauging          Vapor Monitorin

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City ------ Zip-- Manager------------- Mgr. Telephone
4-109308     RAVALLI              MT DEPT HWY-LOST TRAIL SITE      MILE POST 7.1 US 93               DARBY                59811 JERRY ANDERSON         (406) 821-3736

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
1           Curr    Gasoline                 2,000   10  Bare Steel          Galvanized Steel
2           Curr    Gasoline                 2,000   10  Bare Steel          Galvanized Steel
3           Curr    Diesel                   4,000   10  Bare Steel          Galvanized Steel
4           Remv    Diesel                     300   23  Bare Steel          Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-109309     RAVALLI              MT DEPT HWY-HAMILTON SITE        2343 HIGHWAY 93 SOUTH             HAMILTON             59840 DARRELL DAW            (406) 363-4477

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
1           Remv    Gasoline                 1,000   10  Bare Steel          Galvanized Steel
2           Curr    Diesel                   2,000   10  Bare Steel          Galvanized Steel
3           Curr    Gasoline                 4,000   10  Bare Steel          Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-202610     RICHLAND             MT DEPT HWY-SIDNEY SITE          MT 1L NW OF SIDNEY                SIDNEY               59270 ROBERT A WEBB          (406) 365-5296

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
1           Curr    Diesel                   1,000    8  Bare Steel          Galvanized Steel
2           Remv    Gasoline                 1,000   24  Bare Steel          Unknown
3           Curr    Gasoline                 4,000   15  Bare Steel          Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-304026     ROOSEVELT            MDOT - CULBERTSON SECTION        U.S. 2  MILEPOST 644.9            CULBERTSON           59218 BILL JUVE              (406) 653-1050

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
1           Remv    Diesel                   1,000   21  Bare Steel          Galvanized Steel
2           Curr    Gasoline                 2,000    8  Bare Steel          Galvanized Steel
3           Curr    Diesel                   2,000    1  Fiberglass          Fiberglass           Suction -- No Valve    Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-304025     ROOSEVELT            MT DEPT HWY-WOLF POINT SITE      U.S. #2 EAST                      WOLF POINT           59201 JOHN FOWLER            (406) 653-1051

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
1           Remv    Gasoline                10,000   21  Bare Steel          Galvanized Steel
2           Remv    Diesel                   6,000   21  Bare Steel          Galvanized Steel
3           Remv    Diesel                   2,000   21  Bare Steel          Galvanized Steel
4           Remv    Used Oil                   550   11  Bare Steel          Galvanized Steel
5           Curr    Diesel                  10,000    1  Fiberglass          Fiberglass           Suction -- No Valve    Manual Gauging
6           Curr    Gasoline                 6,000    1  Fiberglass          Fiberglass           Suction -- No Valve    Manual Gauging

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-409678     ROSEBUD              MDOT ASHLAND SECTION YARD        U.S. 212                          ASHLAND              59003 STEVE STEPHENSON       (406) 232 10[illegible]

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
1           Curr    ASPHALT                  8,000   12  Bare Steel          Bare Steel
2           Remv    Diesel                   1,000   22  Bare Steel          Bare Steel
3           Remv    Gasoline                 1,000   22  Bare Steel          Bare Steel
4           Curr    Gasoline                 2,000    1  Fiberglass          Fiberglass           Suction -- No Valve    Manual Gauging
5           Curr    Diesel                   2,000    1  Fiberglass          Fiberglass           Suction -- No Valve    Manual Gauging

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA        MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-409683     ROSEBUD              MT DEPT HWYS - COSTRIP SECTION   MT 39                             COLSTRIP             59323 JAY L. DONLEY          (406) 748-2448

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type            RD (Tanks)      -----   RD (Piping)
4310D       Curr    Diesel                   1,000   13  Bare Steel          Bare Steel
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Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager ------------- Mgr. Telephone
3-504066    PETROLEUM            MT DEPT HWY-WINNETT SITE        RTE 5, 244 M.P. ON SEC 244       WINNETT              59087 JACK BARISICH        (406) 429-5811

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Curr    Diesel                    2,000   32   Bare Steel           Unknown
2           Curr    Gasoline                  1,000   17   Bare Steel           Bare Steel
3           Curr    Diesel                    1,000   32   Bare Steel           Unknown
4           Curr    Diesel                    2,000    2   Cath. Steel          Fiberglass                              Tightness Testing
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-604029    PHILLIPS             MT DEPT HWY-MALTA SITE          HIGHWAY 191 MILEPOST 155.3       MALTA                59538 HAROLD OLSON         (406) 654-2579

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Curr    Gasoline                  2,000    8   Bare Steel           Galvanized Steel
2           Curr    Diesel                    1,000   21   Bare Steel           Galvanized Steel
3           Curr    Diesel                    2,000   14   Bare Steel           Galvanized Steel
4           Remv    Used Oil                    300   14   Bare Steel           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-703564    PONDERA              MONTANA HIGHWAY DEPARTMENT                                        CONRAD

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Remv    Gasoline                  1,000   13   Bare Steel           Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-704038    PONDERA              MT DEPT HWY-CONRAD SITE         I-15, MILEPOST 339.3             CONRAD               59425 HUCH LARSON          (406) 278-7931

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Remv    Gasoline                  6,000   26   Bare Steel           Galvanized Steel
2           Remv    Diesel                    4,000   26   Bare Steel           Galvanized Steel
3           Remv    UNKNOWN                     500   23   Unknown              Unknown
4           Curr    Gasoline                  2,000    2   Cath. Steel          Galvanized Steel   Not Marked           Vapor Monitoring         Vapor Monitorin
5           Curr    Diesel                    2,000    2   Cath. Steel          Galvanized Steel   Not Marked           Vapor Monitoring         Vapor Monitorin
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-704036    PONDERA              MT DEPT HWY-DUPUYER SITE                                          DUPUYER              59432 DAVID E. WALL        (406) 472-3270

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Remv    Gasoline                  2,000   18   Bare Steel           Galvanized Steel
2           Remv    Diesel                    2,000   18   Bare Steel           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3 809682    POWDER RIVER         MDOT BROADUS SECTION YARD       U.S. 212  MILE POST 79.3         BROADUS              59317 STEVE STEPHENSON     (406) 232-1093

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Curr    Diesel                    1,000   23   Bare Steel           Bare Steel
2           Remv    Gasoline                    500   12   Bare Steel           Bare Steel
3           Curr    Gasoline                  1,000   23   Bare Steel           Bare Steel
4           Curr    Gasoline                  2,000    1   Fiberglass           Fiberglass         Suction -- No Valve  Manual Gauging
5           Curr    Diesel                    2,000    1   Fiberglass           Fiberglass         Suction -- No Valve  Manual Gauging
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
3-902605    POWELL               DEER LODGE MAINTENANCE SITE                                       DEER LODGE                 CHARLES BAUMAN       (406) 846-1204

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
1           Curr    Diesel                    4,000   11   Bare Steel           Bare Steel
2           Curr    Gasoline                  3,000   11   Bare Steel           Bare Steel
3           Curr    Gasoline                  2,000   11   Bare Steel           Bare Steel
4           Curr    Gasoline                  1,000   11   Bare Steel           Bare Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                MT  59620  LEWIS & CLARK
Facility ID Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4 002612    PRAIRIE              MT DEPT HWY-TERRY SECTION       JCT MT 40 & I-94 S OF TERRY      TERRY                59349 ROBERT A WEBB        (406) 365-5296

Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material    Piping Type          RD (Tanks)        -----  RD (Piping)
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1         Remv    Diesel                      1,000    8  Bare Steel           Galvanized Steel
2         Remv    Gasoline                    1,000   24  Bare Steel           Unknown
3         Curr    Gasoline                    2,000    0  Fiberglass           Galvanized Steel     Suction -  No Valve    Manual Gauging          Vapor Monitorin
4         Curr    Diesel                      2,000    0  Fiberglass           Galvanized Steel     Suction -- No Valve    Manual Gauging          Vapor Monitorin
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-109308     RAVALLI              MT DEPT HWY-LOST TRAIL SITE      MILE POST 7.1 US 93              DARBY                59811 JERRY ANDERSON      (406) 821-3736
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
1           Curr    Gasoline                 2,000     10  Bare Steel           Galvanized Steel
2           Curr    Gasoline                 2,000     10  Bare Steel           Galvanized Steel
3           Curr    Diesel                   4,000     10  Bare Steel           Galvanized Steel
4           Remv    Diesel                     300     23  Bare Steel           Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-109309     RAVALLI              MT DEPT HWY-HAMILTON SITE        2343 HIGHWAY 93 SOUTH            HAMILTON             59840 DARRELL DAW         (406) 363-4477
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
1           Remv    Gasoline                 1,000     10  Bare Steel           Galvanized Steel
2           Curr    Diesel                   2,000     10  Bare Steel           Galvanized Steel
3           Curr    Gasoline                 4,000     10  Bare Steel           Galvanized Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-202610     RICHLAND             MT DEPT HWY-SIDNEY SITE          MT 1L NW OF SIDNEY               SIDNEY               59270 ROBERT A WEBB       (406) 365-5296
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
1           Curr    Diesel                   1,000      8  Bare Steel           Galvanized Steel
2           Remv    Gasoline                 1,000     24  Bare Steel           Unknown
3           Curr    Gasoline                 4,000     15  Bare Steel           Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-304026     ROOSEVELT            MDOT - CULBERTSON SECTION        U.S. 2  MILEPOST 644.9           CULBERTSON           59218 BILL JUVE           (406) 653-1050
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
1           Remv    Diesel                   1,000     21  Bare Steel           Galvanized Steel
2           Curr    Gasoline                 2,000      8  Bare Steel           Galvanized Steel
3           Curr    Diesel                   2,000      1  Fiberglass           Fiberglass           Suction -- No Valve    Inventory Control
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-304025     ROOSEVELT            MT DEPT HWY-WOLF POINT SITE      U.S. #2 EAST                     WOLF POINT           59201 JOHN FOWLER         (406) 653-1051
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
1           Remv    Gasoline                10,000     21  Bare Steel           Galvanized Steel
2           Remv    Diesel                   6,000     21  Bare Steel           Galvanized Steel
3           Remv    Diesel                   2,000     21  Bare Steel           Galvanized Steel
4           Remv    Used Oil                   550     11  Bare Steel           Galvanized Steel
5           Curr    Diesel                  10,000      1  Fiberglass           Fiberglass           Suction -- No Valve    Manual Gauging
6           Curr    Gasoline                 6,000      1  Fiberglass           Fiberglass           Suction -- No Valve    Manual Gauging
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-409678     ROSEBUD              MDOT ASHLAND SECTION YARD        U.S. 212                         ASHLAND              59003 STEVE STEPHENSON    (406) 232-1093
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
1           Curr    ASPHALT                  8,000     12  Bare Steel           Bare Steel
2           Remv    Diesel                   1,000     22  Bare Steel           Bare Steel
3           Remv    Gasoline                 1,000     22  Bare Steel           Bare Steel
4           Curr    Gasoline                 2,000      1  Fiberglass           Fiberglass           Suction -- No Valve    Manual Gauging
5           Curr    Diesel                   2,000      1  Fiberglass           Fiberglass           Suction -- No Valve    Manual Gauging
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager-------------- Mgr. Telephone
4-409683     ROSEBUD              MT DEPT HWYS - COSTRIP SECTION   MT 39                            COLSTRIP             59323 JAY L. DONLEY       (406) 748-2448
                                                                                                    Piping Type               RD (Tanks)       -----  RD (Piping)
Tank ID---  Status  Product-------------  Capacity--  Age  Mat'l of Construct.  Piping Material
4310D       Curr    Diesel                   1,000     13  Bare Steel           Bare Steel
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4310HP     Curr    Gasoline                   1,000   12  Bare Steel           Bare Steel
4310R      Curr    Gasoline                   1,000   13  Bare Steel           Bare Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-409685     ROSEBUD              MT DEPT HWYS - FORSYTH SECTION   OD US 10                          FORSYTH              59327 CECIL LINCOLN         (406) 356-7108

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
4306A1      Curr    ASPHALT                   6,000    8  Bare Steel           Bare Steel
4306A2      Curr    ASPHALT                   6,600    8  Bare Steel           Bare Steel
4306D       Curr    Gasoline                  1,000   15  Bare Steel           Bare Steel
4306R       Curr    Diesel                    4,000   12  Bare Steel           Bare Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-409687     ROSEBUD              MDOT - INGOMAR SECTION YARD      U.S. 12 MILEPOST 230              INGOMAR              59039 STEVE STEPHENSON      (406) 232-1093

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   10  Bare Steel           Bare Steel
2           Remv    ASPHALT                   8,000   11  Bare Steel           Bare Steel
3           Curr    Diesel                    1,000   25  Bare Steel           Bare Steel
4           Curr    Gasoline                  1,000   25  Bare Steel           Bare Steel
5           Curr    Gasoline                  2,000    1  Fiberglass           Fiberglass           Suction -- No Valve  Manual Gauging
6           Curr    Diesel                    2,000    1  Fiberglass           Fiberglass           Suction -- No Valve  Manual Gauging
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-509860     SANDERS              DIXON BRDG PROJECT/REVAIS CRK    3 MILES WEST OF DIXON             DIXON                59831 MONTANA DEPARTMENT OF HIGHWAYS (000)
 000-0000

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                    550  Unk  Bare Steel           Bare Steel
2           Remv    Gasoline                    550  Unk  Bare Steel           Bare Steel
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-508742     SANDERS              MT DEPT HWY-HOT SPRINGS SITE     MT. 28 & HOT SPRINGS RD.          HOT SPRINGS          59845 JACK REICH            (406) 741-3795

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   19  Bare Steel           Bare Steel
2           Remv    Diesel                    1,000   19  Bare Steel           Bare Steel
3           Curr    Diesel                    2,000    0  Fiberglass           Fiberglass           Suction -- No Valve  Manual Gauging
4           Curr    Gasoline                  2,000    0  Fiberglass           Fiberglass           Suction -- No Valve  Manual Gauging
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-508746     SANDERS              MT DEPT HWY-NOXON SITE           MT. 200                           NOXON                59853 NORMAN JENSEN         (406) 847-2650

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   21  Bare Steel           Galvanized Steel
2           Remv    Diesel                    1,000   21  Bare Steel           Galvanized Steel
3           Curr    Diesel                    1,000   16  Bare Steel           Galvanized Steel
S4          Curr    Diesel                      500   21  Bare Steel           COPPER
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-509310     SANDERS              MT DEPT HWY-PLAINS SITE          P.O. BOX 920                      PLAINS               59859 DOUG LUTKE            (406) 826-4457

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1           Curr    Diesel                    2,000    8  Bare Steel           Galvanized Steel
2           Curr    Gasoline                  2,000    8  Bare Steel           Galvanized Steel
3           Curr    Diesel                      500   21  Bare Steel           Unknown
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Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-508743     SANDERS              MT DEPT HWY-THOMPSON FALLS       MT. 200 E. OF THOMPSON FALLS      THOMPSON FALLS       59873 JOE SANDERS           (406) 827-4650

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type         RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   21  Bare Steel           Galvanized Steel
2           Remv    Diesel                    1,000   21  Bare Steel           Galvanized Steel
3           Remv    Gasoline                  1,000   21  Bare Steel           Galvanized Steel
S4          Remv    Diesel                      500   26  Bare Steel           Galvanized Steel
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S5          Remv                             300  Unk
S6          Remv                             300  Unk

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager ------------ Mgr. Telephone
4-604027     SHERIDAN             MDOT - PLENTYWOOD SECTION        MONTANA #5  MILEPOST 41.2         PLENTYWOOD          59254 LARRY PARSONS          (406) 653 1050

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Remv    Diesel                    1,000   21  Bare Steel           Galvanized Steel
2           Curr    Gasoline                  2,000    8  Bare Steel           Galvanized Steel
3           Curr    Diesel                    2,000    1  Fiberglass           Fiberglass           Suction -- No Valve   Inventory Control

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-701062     SILVER BOW           BUTTE DISTRICT HEADQUARTERS      CORNER OF WYNNE & LOWELL          BUTTE               59702 PAT KANE               (406) 494-3224

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  4,000   19  Bare Steel           Bare Steel
2           Remv    Gasoline                  4,000   19  Bare Steel           Bare Steel
3           Remv    Diesel                    4,000   19  Bare Steel           Bare Steel
4           Curr    Diesel                   10,000    4  Bare Steel           Galvanized Steel
5           Curr    Gasoline                 10,000    4  Bare Steel           Galvanized Steel
6           Remv    Gasoline                  3,000   13  Bare Steel           Unknown
7           Curr    Used Oil                  4,000   12  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-701061     SILVER BOW           DIVIDE MAINTENANCE SITE                                            DIVIDE              59727 BILL MALONEY           (406) 267-3324

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Curr    Diesel                    2,000   10  Bare Steel           Bare Steel
2           Curr    Gasoline                  1,000   10  Bare Steel           Bare Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-801935     STILLWATER           MDT RIGHT OF WAY                 302 WOODARD AVE                   ABSAROKEE           59001 EDRIE VINSON           (406) 444-7632

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Temp    Gasoline                    600   38  Bare Steel           Unknown              Not Marked
2           Temp    Gasoline                    600   38  Bare Steel           Unknown              Not Marked

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-809493     STILLWATER           MT DEPT HWY-COLUMBUS SITE        BOX 637                           COLUMBUS            59019 MONTANA DEPARTMENT OF HIGHWAYS (406)
 322-4491

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Curr    Gasoline                  1,000   27  Bare Steel           Unknown
2           Curr    Diesel                      560   21  Bare Steel           Unknown
3           Curr    Gasoline                  1,000   20  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
4-909494     SWEET GRASS          MT DEPT HWY-BIG TIMBER SITE      BOX 977                           BIG TIMBER          59011 MONTANA DEPARTMENT OF HIGHWAYS (406)
 932-5371

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Curr    Gasoline                  1,250   15  Bare Steel           Unknown
2           Curr    Diesel                    2,000   15  Bare Steel           Unknown
3           Curr    Gasoline                  1,000   15  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------- Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-004045     TETON                MT DEPT HWY-CHOTEAU SITE         MILE POST 42, US 89 (N END OF CH  CHOTEAU             59422 FRANK JACONETTY        (406) 466-5385

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material      Piping Type           RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  1,000   31  Bare Steel           Bare Steel
2           Remv    Diesel                    1,000   19  Bare Steel           Bare Steel
3           Curr    Gasoline                  2,000    2  Cath. Steel          Fiberglass                                 Vapor Monitoring       Vapor Monitorin
4           Curr    Diesel                    2,000    2  Cath. Steel          Fiberglass                                 Vapor Monitoring       Vapor Monitorin

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU   ALYCE FISHER  HELENA                 MT  59620  LEWIS & CLARK
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                                    ACCOUNTING BUREAU   ALYCE FISHER  HELENA          59620  LEWIS & CLARK
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Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager----  ------ Mgr. Telephone
5-004046     TETON                MDOT DUTTON SECTION YARD        LEFT OF MILEPOST 313 ON I-15       DUTTON              59433 CARL A. SWANSON       (406) 727-4350

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)       --    RD (Piping)
1            Remv    Gasoline                 2,000    27  Bare Steel           Bare Steel
2            Remv    Diesel                   2,000    19  Bare Steel           Bare Steel
3            Curr    Gasoline                 2,000     2  Cath. Steel          Galvanized Steel    Suction -- No Valve  Vapor Monitoring
4            Curr    Diesel                   2,000     2  Cath. Steel          Galvanized Steel    Suction -- No Valve  Vapor Monitoring

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-104037     TOOLE                MT DEPT HWY-SHELBY SITE                                            SHELBY              59474 BOB OEDEWALDT         (406) 434-2491

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Curr    Gasoline                 4,000    18  Bare Steel           Galvanized Steel
2            Curr    Diesel                   2,000     7  Bare Steel           Galvanized Steel
3            Remv    Gasoline                 1,000    20  Unknown              Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-209499     TREASURE             MT DEPT HWY-HYSHAM SITE         BOX 306                            HYSHAM              59038 MONTANA DEPARTMENT OF HIGHWAYS (406)
 342-5852

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Remv    Gasoline                 1,000    31  Bare Steel           Unknown
2            Curr    Diesel                     560    17  Bare Steel           Unknown
3            Curr    Diesel                   2,000     2  Cath. Steel          Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-304028     VALLEY               MDOT - GLASGOW SITE             R.R. 1 4778                        GLASGOW             59230 BILL JUVE             (406) 653-1050
                                                                  U.S. 2 WEST

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Remv    Diesel                   2,000    14  Bare Steel           Galvanized Steel
2            Remv    Gasoline                 4,000    14  Bare Steel           Galvanized Steel
3            Remv    Gasoline                 1,000    21  Bare Steel           Galvanized Steel
4            Remv    Used Oil                   200    14  Bare Steel           Galvanized Steel
5            Curr    Gasoline                 2,000     1  Fiberglass           Fiberglass          Suction -- No Valve  Manual Gauging         Vapor Monitorin
6            Curr    Diesel                   2,000     1  Fiberglass           Fiberglass          Suction -- No Valve  Manual Gauging

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-301746     VALLEY               MT DEPT HWY-OPHEIM SITE                                            OPHEIM              59250 ROBERT I. BAKKEN      (406) 762-3267

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Curr    Diesel                   2,000     9  Bare Steel           Galvanized Steel
2            Curr    Gasoline                 1,000    18  Bare Steel           Galvanized Steel

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-404070     WHEATLAND            MT DEPT HWY-HARLOWTON SITE      RTE 14, M.P. 101.2 ON US 12        HARLOWTON           59036 RONALD ELINGS         (406) 632-5818

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Curr    Diesel                   2,000    14  Bare Steel           Bare Steel
2            Curr    Gasoline                 2,000    14  Bare Steel           Bare Steel
3            Remv    Gasoline                 1,000    29  Bare Steel           Unknown
4            Remv    HEATING OIL              1,000    28  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-502611     WIBAUX               MDOT - WIBAUX SECTION           I-94 E OF WIBAUX                   WIBAUX              59353 ROBERT A. WEBB        (406) 365-5296

Tank ID---   Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)      -----  RD (Piping)
1            Curr    Diesel                   1,000     8  Bare Steel           Galvanized Steel
2            Remv    Gasoline                 1,000    21  Bare Steel           Unknown
3            Curr    Diesel                   2,000     1  Fiberglass           Galvanized Steel    Suction -- No Valve  Manual Gauging         Vapor Monitorin

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA           MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address------------------ Location City------- Zip-- Manager------------- Mgr. Telephone
5-609501     YELLOWSTONE          MT DEPT HWY-BILLINGS SITE       424 MOREY                          BILLINGS            59104 MONTANA DEPARTMENT OF HIGHWAYS (406)
 252-4138
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Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)           RD (Piping)
1           Curr    Diesel                    2,000   22  Bare Steel           Unknown
2           Curr    Gasoline                  6,000   22  Bare Steel           Unknown
3           Curr    Gasoline                  6,000   22  Bare Steel           Unknown
4           Curr    Gasoline                  2,000   11  Bare Steel           Unknown
5           Curr    Gasoline                  2,000   22  Unknown              Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
5-609500     YELLOWSTONE          MT DEPT HWY-CUSTER SITE          BOX 86                           CUSTER               59024 MONTANA DEPARTMENT OF HIGHWAYS (406)
 856-4810

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     -----  RD (Piping)
1           Curr    Gasoline                  1,000   42  Bare Steel           Unknown
2           Curr    Diesel                    2,000   42  Bare Steel           Unknown

Owner Name & Address: MT DEPARTMENT OF TRANSPORTATION   ACCOUNTING BUREAU - ALYCE FISHER  HELENA              MT  59620  LEWIS & CLARK
Facility ID  Location County----- Location Name------------------ Street Address----------------- Location City------- Zip-- Manager------------- Mgr. Telephone
5-609492     YELLOWSTONE          MT DEPT HWY-LAUREL SITE          BOX 99                           LAUREL .             59044 MONTANA DEPARTMENT OF HIGHWAYS (406)
 628-7244

Tank ID---  Status  Product------------  Capacity--  Age  Mat'l of Construct.  Piping Material     Piping Type          RD (Tanks)     -----  RD (Piping)
1           Remv    Gasoline                  2,000   26  Bare Steel           Unknown
2           Remv    Diesel                      560   26  Bare Steel           Unknown
3           Curr    Gasoline                  2,000    0  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring
4           Curr    Diesel                    2,000    0  Fiberglass           Fiberglass          Suction -- No Valve  Vapor Monitoring
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ATTACHMENT A

Completed MDT Abbreviated Environmental Audit Checklists (may be found in the MDT Environmental and Hazardous Waste Bureau files)